Department of Ecology
2014 Proposed Water Quality Assessment
Public Review

Response to Listing-Specific Comments
Revised October 13, 2015

The Department of Ecology (Ecology) received comments on the draft 2014 Water Quality Assessment (WQA) from 64 entities representing various organizations, governing units, and the public. Comments were submitted in two ways:

1. Comments on a specific category listing were either submitted through an online comment form that was available on the Review Search Tool or directly to Ecology via letter or email. The attached table in this document provides Ecology's response to comments on the WQA related to a specific listing. Comments are in alphabetical order by organization or person, represented by the acronym for each commenter in [brackets].

2. Comments on the WQA not related to a specific listing were either submitted online or directly to Ecology via letter or email. **To view general comments not related to a specific listing and the response to those comments, go to the Response to General Comments.**

Correspondence received during the public review are posted on Ecology's website. Correspondence was received from the following, in alphabetical order with the acronym for each commenter in [brackets] that can be found in the attached table:

Association of Washington Businesses [AWB] - Housekeeper

Bellevue, City of [Bellevue] - Bucich

Bellingham, City of [Bellingham]-Hoover

Belsby, Nancy [Belsby] – self

Boeing Company [Boeing] - Erickson

Boise White Paper, LLC [Boise] - Krajnik

Burlington, City of [Burlington] - Abenroth

Clallam County Road Department [Clallam County] - Chadd

Clark County [Clark County] -Swanson

Clark Regional Wastewater District - Cities of Vancouver & Camas [CRWD] – Peterson, Carlson, Wall

Coeur d'Alene, City of [Coeur-d'Alene] - Fredrickson

Columbia Riverkeeper [Columbia Riverkeeper] - Goldberg

Coon, Dick [Coon] – self

Dashiell, Robert [Dashiell] – self

Davis, Eric [Davis] – self

DeMeyer et al [DeMeyer] – Deymeyer, Holman, Milne

East Columbia Basin Irrigation District [ECBID] - Balliet

Everett Public Works, City of [Everett] – Kibbey, Sklare

Georgeson, Amy on behalf of Mason County [Georgeson] - Georgeson

Idaho Department of Environmental Quality [Idaho DEQ] - Steed

Inland Empire Paper [IEP] - Krapas

Kapstone Kraft Paper Corporation [Kapstone] - Ortiz

King County Department of Natural Resources and Parks [King County] - Isaacson

Kirkland, City of [Kirkland] - Rush

Kitsap County [Kitsap County] - Fohn

Kitsap Public Health District [KPHD] - Whitford

Kittitas County Water Purveyors [KCWP] - Satnik

Klickitat County Natural Resources Department [Klickitat County] – Anderson

Lakewood, City of [Lakewood] - Vigoren

Lengenfelder, James [Lengenfelder] - self

Liberty Lake Sewer and Water [Liberty Lake] – Jenkins

Loehr, Lincoln [Loehr] - self

Longview, City of [Longview] - Warner

Muckleshoot Tribe [Muckleshoot] – Rapin

Northwest Environmental Advocates [NWEA] - Bell

Northwest Pulp and Paper Association [NWPPA] - McCabe

Olympia, City of [Olympia] - Graham

Pierce County Surface Water Management [Pierce County] - Groce

Ponderay Newsprint [Ponderay Newsprint] - Johnson

Port of Seattle [Port of Seattle] - Duffner

Rogers, Cheryl [Rogers]- self

Rogers, Eric [Rogers-Eric]- self

Roza-Sunnyside Board of Joint Control [RSBOJC] - Brouillard

SeaTac, City of [SeaTac] - Robinett

Seattle City Light [SCL] - Armstrong

Seattle Public Utilities, City of [Seattle] - Hoffman

Smith, Peter – self

Snohomish County Public Works Department [Snohomish County] – Williams, Kerwin

South Columbia Basin Irrigation District [SCBID] - Shopbell

Spokane River Stewardship Partners [SRSP] - Wilson

Streamkeepers of Clallam County {Streamkeepers] - Chadd

Thurston County Department of Resource Stewardship [Thurston County] – Benson

Trout Lake Community Council [Trout Lake] - Arnold

U.S. Bureau of Reclamation Ephrata Field Office [USBOR] - Belchoff

U.S. Environmental Protection Agency Region 10 [USEPA] - Croxton

U.S. Forest Service Colville National Forest [USFS-Colville] - Hickenbottom

U.S. Forest Service Regional Office [USFS-PNR] - Pena

U.S. Navy [US Navy] - Jabloner

Vancouver, City of [Vancouver] - Sutton

Washington Department of Transportation Resource Programs Branch [WDOT] - Stone

Washington Forest Protection Association [WFPA] - Terwilleger

Weyerhaeuser [Weyerhaeuser] - Johnson

White Salmon, City of [White Salmon] - Poucher

White Salmon Irrigation District [WSID] - Trout

COMMENTER	LISTING ID	COMMENT	ECOLOGY RESPONSE
Bellevue	72026 72036 72024	This comment is about the proposed new pH listings for Lake Washington and Lake Sammamish; for Bellevue, this includes listings #72026, #72036, and #72024. Bellevue concurs with King County's comments and recommendation for the new lake pH listings. Bellevue recommends that the new pH listings be categorized at Category 2 (Segment is a Water of Concern) because the data represents acute, transitory daily excursions likely due to natural conditions. King County staff responsible for collecting and analyzing the lake data referenced in the listing and for conducting long term trend analysis for the lakes have not identified degradation or change in trophic state index for any of these lakes. This comment applies to all new 303(d) Listings for pH, including listings #72026, #72036, and #72024.	The pH listing category determinations for the noted waterbodies/listings are consistent with the methodology for determining compliance with pH criteria statewide as specified in Policy 1-11. The state water quality standards do not specify a pH averaging period and therefore permit the use of instantaneous pH measurements in the evaluation of standards compliance. Policy 1-11 allows for 10% of daily values in a given year to exceed the applicable pH criteria and thus to a degree does account for periodic transitory excursions. Ecology would need data/information indicating that the observed values are due to natural conditions and that anthropogenic sources are unlikely to contribute to the observed excursions before the Category 5 designations for the affected listings could be removed.
Bellingham	61036	The listing ID 61036 (Bacteria) determination is not appropriate for the following reasons: The criteria for listing is based off of an incorrect number of samples. A search of the EIM database for this site on 3/19/15 shows the number of samples taken from site WHA021A in 2009 was 20 (not 17 as was utilized for determination of impaired status). Therefore, the percent enterococcus criterion of 10% of samples above 208 col/100 ml was not exceeded. In addition, the total number of samples taken in 2009 from the three sites listed as reference EIM User Location IDs was 55, making the total percent exceedance for the area 2/55 samples, or 3.6%.	There are 3 dates with multiple samples collected, those data are averaged per Policy 1-11 (2012) for Jun 30, Jul 20 and Aug 4, therefore 17 samples during the Water Year. Data are also averaged between stations within the assessment unit, therefore on Jun 22 the sum of 660, 10 and 31 is 701 and the average of 233.67 exceeds. On July 28 the summed data was 860 with the subsequent average (286.67) exceeding the criterion.
Bellingham	61036	The site used to make this determination (WHA021A) is not representative of the area to be listed. Site WHA021A is located in a shallow, tidally limited lagoon. Due to a rip-rap sill under the Burlington Northern Railroad trestle, the lagoon does not receive tidal exchange with Bellingham Bay when tides fall below +6 ft. Mean Lower Low Water (MLLW). In addition, the site is located at the terminus of an ephemeral drainage that flows directly under a Great Blue Heron Colony located approximately 100 yards upstream. Results from other EIM listed sample sites, both within and outside of the lagoon (WHA021B and WHA021C respectively) show no exceedance of enterococcus criterion for the entire duration of sampling at those locations. The area surrounding the sampling site in question has undergone extensive study and restoration efforts since the EPABEACH findings of 2009. In efforts to protect the heron colony and the fragile habitat in and around the small pocket lagoon, the City of Bellingham has fenced off and closed the area to the public (it used to be used as an off-leash dog park). In addition, riparian, salt marsh and eel grass plantings, as well as large woody debris have been added to the site in order to rebuild the natural habitat in the area. As follow up to restoration efforts, conditions in the Lagoon continue to be monitored by the City of Bellingham.	We appreciate your input, however, we have identified station location problems within EIM and the stations and samples that were identified as having excursions from the criterion are along the beach, not within the lagoon. The lagoon data are what led to the listing. Ecology is aware of the exceptional efforts by the City of Bellingham and we are aware that there are new data that we will assess in the next assessment cycle.
Belsby		It is important to note that the native species of fish in WRIA 34 are warm water species which are non-salmonid. This is important as regards temperature. Temperature may be out of compliance as required by the State Department of Ecology (DOE), but it may be due to natural conditions so it should not be listed as being out of compliance. There are no salmon above the Palouse Falls. DOE must continue to recognize the status and protection of non-diversionary stockwater on riparian grazing lands (RCW 90.22.040). In the Cow Creek Adjudication, stock water has senior priority date of June 30, 1868. Ecology has obligation in accordance with the Decree for the maintenance of stock water according to the Adjudication and in accordance with Chapter 90.03 RCW under cause No. 13538 Report of Referee	The designated uses of waterbodies that must be maintained in WRIA 34, as noted in Table 602 of the state water quality standards (WAC 173-201A-600) include stock water, agricultural water, aquatic life, recreation, and several other designated uses. In this regard, water quality must be protected for use as stockwater as well as aquatic habitat. Washington State law protects both water rights and water quality and actually prohibits water quality protection programs from impinging upon water rights (RCW 90.48.422). The state water quality standards have a provision to address waterbodies in which temperatures become naturally elevated above the assigned water temperature criteria. In cases where temperatures naturally exceed the assigned criterion, the criterion equals the natural conditions. This would need to be determined through a waterbody specific study such as a Total Maximum Daily Load study. In order to change the aquatic life uses above Palouse Falls, a Use Attainability Analysis would need to be done to determine that salmonid species are not present above Palouse Falls, and replaced with warm water species if that were found to be the case.
Boeing	79850	The QAPP and report state that both total and dissolved mercury levels were analyzed for each location, but the data from the website only show one value for mercury concentration per sample date. It is not stated whether these values represent total or dissolved mercury concentrations. It also does not specify	It was not clear from the comment which website the commenter is referring to, in reference to data. There were two results for mercury on sample dates: dissolved and total (these descriptors are in the field named "Fraction Analyzed"). Both forms are used in the

		what factor should be used to convert between dissolved and total concentration values for comparison to the WAC 173-201A-240A water quality standards. In the case of the sample collected on 10/17/2009, the average mercury concentration obtained was 0.01 µg/L. If this is a total mercury value, then it would not have exceeded either the acute or chronic WAC 173-201A-240A limits which are stated as 2.1 µg/L and 0.012 µg/L respectively. If it was a dissolved value, it should have been converted to a total mercury concentration value using the total-recoverable fraction calculated from the actual Powder Mill Creek data. Please contact Tarah Erickson at 425-234-4279 or Alan Sugino at 425-717-6117 if you have any questions.	Assessment: dissolved for comparison to the acute criterion and total for comparison to the chronic criterion. Therefore both the dissolved and total data were assessed. While the data in EIM are not fully correct (rounding and significant figure errors occurred during loading to EIM), the data used for the assessment was corrected and shows the following results for the location and date in question: dissolved Hg=0.007 µg/L; total=0.0144 µg/L. The conversion factor the commenter refers to is used when receiving water data are used to calculate effluent limits. The conversion factor is not used for converting one fraction of mercury to another for Assessment purposes (e.g. converting a sample result that is the dissolved fraction to a result representing a total recoverable fraction).
Boise	78816	Request reconsideration of the proposed Category 5 PCB listing for the water segment in Lake Wallula (Columbia River) just downstream from our facility. A review of the proposed 303(d) listing #78816 for the Columbia River (Lake Wallula) segment for PCBs indicates that the listing is based on data that are no longer representative of current conditions. Additionally, the listing both deviates from Ecology's 303(d) listing guidance and past practice and is based on considerable scientific uncertainty in the screening evaluation. As a result of the uncertainties in the data and process used by Ecology to support the proposed 303(d) listing of Lake Wallula, the listing should be revised to Category 3 consistent with past listing cycles, or to Category 2 as a water body of concern.	This listing meets Policy 1-11 requirements. Data were collected within the 10 year time period for which this assessment is based. Subsequent data that shows a change in the concentration of this pollutant is necessary to change from Category 5. Data age alone is not sufficient for removal of listing from Category 5 unless sufficient data (based on the requirements to meet Cat. 1) are available to determine that designated uses are no longer impaired.
Boise	78816	Based on the age of data o n which the proposed 303(d) listing is being based and on the potential reduction in PCB concentrations in fish tissue during the past decade, the proposed 303(d) Category 5 listing for PCBs should be revised or more recent data should be used to support the listing. The data collected in 2003 indicated exceedance of tissue criterion, but the persistence of that exceedance to the present day has not been demonstrated. A Category 2 or Category 3 listing for Lake Wallula would allow time for additional data to be collected to more precisely evaluate the current condition of the lake, thus leading to more appropriate 303(d) listing consideration.	This listing meets Policy 1-11 requirements. Data were collected within the 10 year time period for which this assessment is based. Subsequent data that shows a change in the concentration of this pollutant is necessary to change from Category 5. Data age alone is not sufficient for removal of listing from Category 5 unless sufficient data (based on the requirements to meet Cat. 1) are available to determine that designated uses are no longer impaired.
Boise	78816	The fish tissue data used by Ecology to support the proposed Category 5 listing in this 2014 cycle were available for two of the past 303(d) listing cycles, but the data were not considered to be sufficient to justify a Category 5 listing during those previous listing cycles.	This data may not have been submitted for previous assessment but falls within the ten year window for data considered for this assessment period and met data quality requirements, therefore it was used.
Boise	78816	Ecology should evaluate the need for additional data because the result of one composite sample may not be representative of the predominant water quality conditions and may not be sufficient for determining a water quality impairment. The proposed listing should be removed and designated as Category 3 (insufficient data) until additional data can be collected to more sufficiently assess the water quality.	The available tissue data meets Policy 1-11 requirements for listing based on one composite sample.
Boise	78816	Review of the 303(d) listing database indicates that the proposed listing is not based on actual surface water data collected in Lake Wallula. Instead, to determine the need for a 303(d) listing in Lake Wallula, Ecology compared the total PCB concentration reported for the smallmouth bass composite (11 .8 1-1g/kg) to the Fish Tissue Equivalent Concentration (FTEC) of 5.4 1-1g/kg. An exceedance of the FTEC does not necessarily indicate that the actual instream concentration is greater than the water quality standard, because the FTEC derivation includes a default Bioconcentration Factor (BCF) of 31,200 Ukg developed by the EPA for PCBs in 1980 from only laboratory data (EPA 440/5-80-068, October 1980).	Ecology currently depends on the numeric criterion to help calculate acceptable tissue concentrations for this determination. Current policy specifies that tissue data, as used, is acceptable for listing. Comments related to tissue can be considered at the next revision of Policy 1-11.
Burlington	7142	Gages Slough (listing 7142) should not be listed for bacteria (4A). Gages Slough is a depression outflow wetlands. Water quality is per WAC 173-201A-260 3 (i) "The primary means for protecting water quality in wetlands is through implementing the anti-degradation procedures described in Part III of this chapter." Wetlands are slow moving or stagnant waters which benefit and attract wildlife. This leads to bacteria levels above fresh water standards (hence the reason for different water quality standards for wetlands). Gages Slough should not be required (and will not be able) to meet fresh water standards for bacteria.	Gages Slough is a side channel to the Skagit River and is not itself a designated wetland. The City of Burlington's Gages Slough water quality report (2007) states on page 1: "The slough was originally an old meander channel or sub-cannel of the Skagit River and is currently isolated from the mainstem Skagit by a series of dikes". The channel itself is over 7 miles long and has some scattered wetland features throughout the lower reach, but that is not unlike any other stream. Dikes and artificial ponds are known to effect water movement throughout a system, so there are likely some manmade features that slow the water down in some areas. It is also worth noting that Gages Slough runs through downtown Burlington, so while there could be some wildlife impacts to the stream, there are also potential impacts from human sources such as failing septic systems, agricultural manure, and effluent from wastewater, that contribute to the problem. Gages Slough also has a load allocation for their

			pump station that the TMDL addresses. Given all these factors, there is nothing to indicate listing 7142 should be exempt from the normal delisting process at this time.
Clallam County	79009, 79024	Along with our EIM data upload, in 2011 we submitted a special analysis of turbidity data from 2007-2011 indicating exceedances of the standard, which should have brought about several Category 2 listings. Similarly, in 2006 we submitted a special turbidity analysis with data from 2001-2005, also indicating several exceedances which should have brought about Category 2 listings. Later, when we asked why these latter data weren't accounted for, we were told that it was an oversight on Ecology's part. There seems to be another oversight in this cycle. Please look at both of these reports to find all the relevant turbidity data for the prior ten years, as the listing policy specifies. If you can't find the data we submitted, we would be happy to resubmit.	We appreciate the identification of our oversight. These data have been assessed and are incorporated into Listings 79009 to 79024.
Clark County	72482	Salmon Creek is under a bacteria TMDL	The identified listing has been moved to Category 4A as it has been determined that the impairment is addressed by the Salmon Creek bacteria TMDL.
Clark County	72481	Rockwell Creek is tributary to Salmon Creek which has a bacteria TMDL.	The identified listing has been moved to Category 4A as it has been determined that the impairment is addressed by the Salmon Creek bacteria TMDL.
Clark County	72486	Gibbons Creek has a TMDL.	The identified listing has been moved to Category 4A as it has been determined that the impairment is addressed by the Gibbons Creek bacteria TMDL.
Clark County	72469	Gibbons Creek has a TMDL.	The identified listing has been moved to Category 4A as it has been determined that the impairment is addressed by the Gibbons Creek bacteria TMDL.
Clark County	72483	Salmon Creek is under a bacteria TMDL	The identified listing has been moved to Category 4A as it has been determined that the impairment is addressed by the Salmon Creek bacteria TMDL.
Clark County	74343	The Gee Creek criteria should be primary contact. This is extraordinary, probably due to it being tributary named Lake River. Lake River is a river channel tributary to the Columbia River. Not a lake.	Gee Creek is designated extraordinary primary contact recreation use because the NHD indicates that it is a tributary to Lancaster Lake (rather than Lake River) and that the outlet stream of Lancaster lake is Gee Creek, which flow directly into the Columbia River; although Gee Creek may have a hydrologic connection to Lake River, it appears as though the majority of the discharge in Gee Creek flows into Lancaster lake most of the time. No change is warranted to the designated use or impairment category designation in the assessment.
Clark County	74344	The Gee Creek criteria should be primary contact. This is extraordinary, probably due to it being tributary named Lake River. Lake River is a river channel tributary to the Columbia River. Not a lake.	Gee Creek is designated extraordinary primary contact recreation use because the NHD indicates that it is a tributary to Lancaster Lake (rather than Lake River) and that the outlet stream of Lancaster lake is Gee Creek, which flow directly into the Columbia River; although Gee Creek may have a hydrologic connection to Lake River, it appears as though the majority of the discharge in Gee Creek flows into Lancaster lake most of the time. No change is warranted to the designated use or impairment category designation in the assessment.
Clark County	70006	It seems like the BIBI should be used for a 305(b) assessment rather than a 303(d) listing. It is not possible to tie a particular pollutant to a BIBI score. BIBI scores are a surrogate for a host of problems and not appropriate for 303(d) listing and TMDL development.	EPA 2006 Integrated Report Guidance clearly states that if a designated use is not supported and the segment is impaired or threatened, the fact that the specific pollutant is not known does not provide a basis for excluding the segment from Category 5. The guidance goes on to state that those segments must be listed unless the state can demonstrate that no pollutant(s) causes or contribute to the impairment. EPA guidance further states that upon further study, if the assessment of the new data and information demonstrates that the use impairment is not associated with a pollutant and is attributable only to other types of pollution (e.g., flow or habitat alteration) the segment may be placed into Category 4C.
Clark County	22005	7 of 59 samples fail. Consider leaving in Category 2.	This listing will remain in Category 5 in accordance with Policy 1-11. At least 10 percent of samples were excursion of the criteria in at least one year and at least 3 excursions exist from all data considered.
Clark County	22092	Jones Creek has very low dissolved solids with specific conductance at extremely low levels. 10 -30 micro Siemens. This sometimes makes pH readings unreliable and low.	This listing will remain in Category 5 in accordance with Policy 1-11. For years 2007, 2008, 2009, and 2010, at least 10 percent of samples were excursion of the criteria in at least one year and at least 3 excursions exist from all data considered. In order to make a natural conditions call more information will need to be provided to ascertain that the low pH conditions are not being at least partially caused by human influences.

Clark County	22001	10 of 59 samples fail. Consider leaving in Category 2. The 9.5 mg/l is a very high standard.	The Category 5 designation is based on data from 2006, 2007, and 2009. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Clark County	22029	4 out of 60 readings for DO of 9.5 mg/l is not a suitable criteria for listing.	The Category 5 designation is based on data from 2006, 2009, and 2010. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Clark County	77930	Consider placing in Category 2 due to limited data.	The Category 5 designation is based on data from 2007 and 2008. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Clark County	72448	Consider placing in Category 2 due to limited data and the geometric mean meets standards.	This listing remains in Category 5. Impairment was determined by exceedance of the percent criterion in water year(s) 2008, per Policy 1-11.
Clark County	22022	This listing is very problematic because Jones Creek is a fairly pristine basin and a source area for the City of Camas water system. The site has excellent water quality based on the Oregon DEQ Water Quality Index and has BIBI scores over 40. Natural conditions or a Category 2 listing may be more appropriate than addressing through a TMDL. Also consider that the city manages the basin to protect water quality, which may qualify for a Category 4 listing.	Until further information is presented to determine whether the temperature exceedances are due to natural conditions, this listing remains in Category 5 in accordance with Policy 1-11.
Clark County	72866	Place in Category 2 due very infrequent failure to meet criteria and the 16 degree standard.	This listing remains in Category 5 based on data from years 2009 and 2010. According to Policy 1-11, a segment will be placed in Category 5 for temperature if at last one 7-day average daily maximum value from seven consecutive daily sampling events exceeds the criterion.
Clark County	72868	Place in Category 2 due very infrequent failure to meet criteria and the 16 degree standard.	This listing remains in Category 5 based on data from year 2010. According to Policy 1-11, a segment will be placed in Category 5 for temperature if at last one 7-day average daily maximum value from seven consecutive daily sampling events exceeds the criterion.
Clark County	72877	Place in Category 2 due very infrequent failure to meet criteria and the 16 degree standard.	This listing remains in Category 5 based on data from years 2006, 2007, 2008, 2009, and 2010. According to Policy 1-11, a segment will be placed in Category 5 for temperature if at last one 7-day average daily maximum value from seven consecutive daily sampling events exceeds the criterion.
Clark County	9548	Listing data greater than 10 years old. Consider leaving in Category 2.	The data that was assessed, between 2001 and 2003, fall within the ten year period defined by the call-for-data, which used data up through December 2010.
Clark County	11040	List as Category 2. Most of the data is greater than 10 years old.	The data that was assessed in the years 2002, 2003, 2004, and 2005, fall within the ten year period defined by the call-for-data, which used data up through December 2010.
Clark County	72886	Data is over 10 years old. Category 2	This listing is based on data collected in 2005 and falls within the ten year period defined by the call-for-data, which used data up through December 2010.
Clark County	72889	Data is over 10 years old. Category 2	This listing is based on data collected in 2005 and falls within the ten year period defined by the call-for-data, which used data up through December 2010.
Clark County	7943	Very old data. Leave in Category 2.	The category designation for Listing 7943 has been combined with listing 7947, which has been an existing Category 5 since 1998, not because of a reassessment of old data. Therefore, there is no option to leave listing 7944 in Category 2. To change the category, new data would be needed which shows that a category change is warranted.
Clark County	7944	Very old data. Leave in Category 2.	The category designation for Listing 7944 has been combined with listing 7946, which has been an existing Category 5 since 1998, not because of a reassessment of old data. Therefore, there is no option to leave listing 7944 in Category 2. To change the category, new data would be needed which shows that a category change is warranted.
Clark County	7905	This data is outdated. There is a bacteria TMDL study underway in the basin. No geomean is calculated. Too few data points for 10 percent criteria.	Impairment in this waterbody segment was determined by exceedance of the geometric mean criterion in water year (2005, and the percent criterion in water years 2005, 2004, 2003. A TMDL is underway in this basin. When the TMDL is completed and approved, this listing will move to Category 4A.
Clark County	70009	Along with issues listed for 70006, Curtin Creek sand substrate does not meet the assumption of a gravel riffle substrate for BIBI samples.	Bioassessment data submitted to EIM/Ecology were assessed without regard to the requirements set forth in the 2012 Standard Operating Procedure. New data assessments

			may be required during the next assessment cycle if it is determined that the most recent data do not meet those 2012 SOP directives.
Clark County	70012	See BIBI listing comments for Cougar Canyon and Curtin Creek.	Bioassessment data submitted to EIM/Ecology were assessed without regard to the requirements set forth in the 2012 Standard Operating Procedure. New data assessments may be required during the next assessment cycle if it is determined that the most recent data do not meet those 2012 SOP directives.
Clark County	70021	See BIBI listing comments for Cougar Canyon and Curtin Creek.	Bioassessment data submitted to EIM/Ecology were assessed without regard to the requirements set forth in the 2012 Standard Operating Procedure. New data assessments may be required during the next assessment cycle if it is determined that the most recent data do not meet those 2012 SOP directives.
Clark County	70030	See BIBI listing comments for Cougar Canyon and Curtin Creek.	Bioassessment data submitted to EIM/Ecology were assessed without regard to the requirements set forth in the 2012 Standard Operating Procedure. New data assessments may be required during the next assessment cycle if it is determined that the most recent data do not meet those 2012 SOP directives.
Clark County	16772, 21994, 74343, 74344	Bacteria listings for Gee Creek appear to use the exceptional water body standard instead of the contact recreation standard. Perhaps this is an oversight due to Gee Creek discharging to Lake River, which is actually a river, not a lake, tributary to the Columbia River.	Gee Creek is designated as having extraordinary primary contact recreation use because the NHD indicates that it is a tributary to Lancaster Lake (rather than Lake River) and that the outlet stream of Lancaster lake is Gee Creek, which flow directly into the Columbia River. Although Gee Creek may have a hydrologic connection to Lake River, it appears as though the majority of Gee Creek flows into Lancaster Lake most of the time. Therefore we have determined that a change is not warranted to the designated use or impairment category designation in the assessment.
Columbia Riverkeeper		In reviewing Ecology's proposed 303(d) List, Columbia Riverkeeper discovered seventeen sites where Riverkeeper's temperature monitoring data was not included in the review. One of these sites should lead to a change in listing status; all other sites are either previously listed or a new proposed listing is supported by other data, either belonging to Riverkeeper or others. However, Columbia Riverkeeper requests that Ecology review all monitoring sites and incorporate the data into the assessment. The one site that should have a proposed temperature listing, but does not, is Rowland Lake (LASAR35577). Columbia Riverkeeper collected continuous temperature data in 2008, 2009, and 2010 that support a Category 5 temperature listing at Rowland Lake.	We appreciate your identification of an error that occurred while creating the Large River Assessment Units. The locations in question have been examined and assessed.
Columbia Riverkeeper		Columbia Riverkeeper collected continuous temperature monitoring data at 16 sites which support Category 5 listings. While the Columbia Riverkeeper data would not affect a change in listing, the data bolsters the basis for the proposed or existing listing.	We appreciate your identification of an error that occurred while creating the Large River Assessment Units. The locations in question have been examined and assessed.
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Columbia Riverkeeper		Columbia Riverkeeper collected continuous temperature monitoring data at 16 sites which support Category 5 listings. While the Columbia Riverkeeper data would not affect a change in listing, the data bolsters the basis for the proposed or existing listing.	We appreciate your identification of an error that occurred while creating the Large River Assessment Units. The locations in question have been examined and assessed.
Coon		As a land owner at the south end of Cow Creek, I naturally am concerned about the quality of water coming south from Sprague Lake. The quantity of water is also a big concern in a drought period of course, but there's not much any of us can do about that. The problem is the large amount of vegetation clogging the south end of the lake. Without a faster exit from the lake, it creates a large stagnant bathtub. The level of the lake is important for the fishery and the recreation, but improving the outflow a little bit would not only improve the water quality, but get more water downstream and keep the creek bed hydrated for a longer	We appreciate your interest in protecting water quality. We do not disagree that increased summertime flows in Cow Creek would result in improved water quality. However, the Dept. of Ecology's Water Quality Program does not have jurisdiction over activities that would alter water levels in Sprague Lake. The dense aquatic vegetation growth in the lake outlet may be entirely natural or may be influenced by elevated nutrient and sediment loading to the lake. If human activities have increased sediment and nutrient loading to the lake, then efforts to improve water quality in the watershed may help to control excessive aquatic vegetation

		period of time. Lowering the lake 6" for 67 days would move 2000 gpm or nearly 4.5 cfs downstream. I don't think the fishery would suffer and it would keep the lake much cleaner.	growth in the lake. Controlling the aquatic plant growth may have no effect upon lake outflows since without a dam to hold back water and adjust the outflow rate, the amount of water flowing into the lake is roughly the same as the amount flowing out at any given time. It is not apparent to us how the lake level could be temporarily lowered to improve flows in the creek downstream. Deepening the outlet channel would cause the water elevation in the lake to lower and adjust to the new level of the channel (and would probably not lead to a reduction in the amount of aquatic vegetation). Therefore, deepening the outlet seems likely to result in summer flows that are the same as before the outlet modification.
Dashiell	40151	Springbrook Creek has had intense water quality monitoring every year by the City of Bainbridge Island Water Quality group. That testing data is not appearing on Ecology's data base. So with it isn't getting submitted, or it isn't being entered. That needs to be resolved. It's a flow monitored, intensely monitoring little stream. It may or may not have been removed from the Dyes/Sinclair inlet TMDL area. A U/W total report showed less than 3% of all stream discharge carried into Sinclair Inlet. City tried intensely to keep in included (they wanted more grant money), but I think Ecology has now recognized that is not a pollution source for Sinclair Inlet. Because the City could not resolve the source of FC in the past 13 years on this 2.3 mile stream, Kitsap Public Health District put their resources over to monitoring this stream in 20014-2105. This is sort of a quite program since they finished Murden Cove water quality grant early and needed something to justify their grant salary until the planned end of the grant period. They reportedly have made progress, but will not release their data until January 2016 (end of grant report). So the question is whether this site is still in the Sinclair/Dyes Inlet TMDL area, and why this intensely monitored small stream does not have recorded water quality data. If it has been removed from the Sinclair.Dyes inlet TMDL area, then it should not be Cat 4A.The stream does not have any TMDL action associated with Sinclair/Dyes inlet. However, it's as political hot potato since the City has not determined a source of pollution (or of its all non-point pollution) in 13 years of water quality monitoring. It does have a horse farm and a hoover animal farm on the stream course. The Kitsap Conservation District has been working every year with those property owners, but there is no record that the farm animals are the source of pollution. City Water Quality staff have said they believe it is a leaking septic system from an abandoned residence. Problem there is the property has been abandoned for more than 50 years, and so there is suspicion that a septic system would not be polluting a stream some 50 years after it has been abandoned, but that hasn't been proven. Kitts Public Health probably has that answer, but they say they will not release information until January 2016.	We appreciate your comment. Springbrook Creek is covered by the Sinclair and Dyes Inlet Bacteria TMDL. The data used in this assessment is from years 2001 through 2010. Data collected after 2010 will be used in the next assessment. Ecology is required to use all credible water quality data in the assessment that has been submitted to us. Data not used in this assessment was likely omitted because it was: 1) not submitted to Ecology during the call for data; 2) was collected after the date range for data used in this assessment; or 3) the quality assurance and quality control requirements for the data were not satisfied and/or documented.
Dashiell	74665	Murden Creek (and Murden Cove) has a 2013-2104 Water Quality grant effort headed by the Kitsap Public Health District. That work has been completed (per public document request), but because the grant does not expire until January 2016, the Health District is not releasing the data (apparently awaiting a final report). Verbally, KCHS (Eva Crim) has indicated the problems have been identified and resolved with some private party septic improvements. It will be illogical to have this stream newly added as a Cat 5 IF there is current data that exists and is being withheld because of end of grant cycle timing. If classified as a new class 5. Does that not mean a TMDL is required? That can be very expensive IF and useless IF the stream now meets bacteria standards.	Data that has been considered in this assessment is from the period of January 2001 through December 2010. If the post-2010 data is submitted to Ecology it will be used to update the listing in the subsequent assessment. However, this listing has been moved to Category 4B because the bacteria impairment is being addressed by the Kitsap Pollution Identification and Control Program.
Dashiell	40151	There is nothing in the Basis to support a 2012 Cat 5 ... and the studies haven't shown exceedances since 2002. Location is in the Dyes Inlet TMDL area, but this site now has acceptable standards according to data available in Ecology's data base.	The listing does not qualify for Category 1 because less than 10 samples showing standards compliance are available for any of the years in which monitoring was performed. The listing

		This ID borders only the City of Bainbridge Island. There is no active TMDL action required for the Dyes and Sinclair Inlet for this specific listing ID. So the question is whether a Listing ID that is in a large TMDL area but has no TMDL action required and has not had exceedances since 2002 should be classified 4A. At least that is a little more accurate than Cat 5 in 2012.	has been placed in Category 4A because the bacteria impairment can be addressed through the Sinclair & Dyes Inlets Tributaries Bacteria TMDL.
Davis		(1) Allow searchers to type in the name of the waterbody. Had to go thru a couple hundred to get to my target, Loon Lake. (2) The Loon Lake site was unstable. Tried to go to page 2 but system flipped me back to the input page without that page having preserved any of my original input data--so would have to start over. Very cumbersome. (3) Page 1 of Loon Lake site said 22 "matched Listings, but ultimately I could only find 19 listed using my Loon Lake specific search and a broader, Lakes in Stevens County search.	We appreciate the suggestion. It will be considered as the database is updated in the future.
DeMeyer	40588	We request that Capitol Lake's "bacteria" Category 5 listing be removed. The original designation of Capitol Lake as a 303(d) category 5 impaired water body dates to 1997, based upon four measurements showing high coliform levels taken in January-March. Prior to that time, the Lake was the recipient of discharges from perhaps 30 storm drains and sewers and bacteria concentrations were ve1y high, justifying closure of the Lake to swimming in 1985. Since then, Olympia, Tumwater, and Thurston County have aggressively eliminated those sources of contamination, with the result that we see after 1999 -water clean enough for swimming. These actions were (and are) precisely what the "Category 5 bacteria" designation is intended to prompt and encourage. They represent a success story that our communities and regulatory agencies can be proud of, and should receive credit for. Removal of the "bacteria" designation would acknowledge that sustained and ultimately successful effort.	At this time there are not sufficient data to determine if Capitol Lake is meeting the requirements to change from a Category 5 designation to Category 1. Per Policy 1-11 (2012), at least 10 data samples from the critical time of year, where both the percent and the geometric mean do not exceed the criterion, are required for this change in listing.
DeMeyer	40588	I question the continued listing for Bacteria. Thurston County records indicate that Lake has met the Bacteria standard for the past 15 years. See the County's 2014 Water Quality Report.	At this time there are not sufficient data to determine if Capitol Lake is meeting the requirements to change from a Category 5 designation to Category 1. Per Policy 1-11 (2012), at least 10 data samples from the critical time of year, where both the percent and the geometric mean do not exceed the criterion, are required for this change in listing.
ECBID		The East District is concerned with the validity of some of the data being used in previous and current 303 (d) listings. It has been brought to our attention that raw Bureau of Reclamation (Bureau) data has been taken from STORET and used in the assessment of East District facilities. This data has not been fully evaluated through a Quality Assurance/Quality Control (QA/QC) plan. The East District request that all Bureau data obtained through STORET resulting in 303(d) listings be removed as it was not obtained following the requirements as stated in the Water Quality Data Act (RCW 90.48.570 through RCW 90.48.590) that states: "Ecology shall use credible data for the following actions-determining whether any water of the state is to be placed on or removed from any section 303(d) list."	US Bureau of Reclamation has informed Ecology that the STORET Project data have not been through appropriate QA\QC and should not be used for assessment. Ecology has removed these data from the assessments because of insufficient QA/QC in accordance with credible data requirements.
Everett		A specific comment on the new Category 5 bioassessment listing for North Creek. Samples taken by Snohomish County in Snohomish County have been extended by segment up into the City of Everett all the way to the headwaters of the creek. This is problematic. The area above 128th street would go completely dry in the summer if not for supplementation by the North Creek pump station operated by the City. The City has a temporary water rights permit from Ecology to pump water for non-consumptive use into the creek from May 1-Nov. 15 each year. If we don't pump, there are no fish or macroinvertebrates in the creek during most of this time period. Because this is an artificial condition, but one that is supported by another section of Ecology (Water Rights), Washington Department of Fish and Wildlife, the public, and Adopt-a-Stream (located just over the City-County line), we do not think it reasonable to list this as a Category 5.	The reaches of North Creek that are affected by flow augmentation during a portion of the year are considered to be waters of the state and thus the existing and designated uses of the waterbody must be maintained and protected. If the natural conditions of the waterbody are found to be lower than the assigned water quality criteria, then the natural conditions of the waterbody constitute the water quality criteria. Pending the results of further water quality investigation, the Category 5 designation for bioassessment will remain in effect. Ecology anticipates working closely with the City of Everett to resolve the unique habitat and water quality circumstances affecting the support of the existing and designated uses for North Creek.
Everett	6322	Everett has a specific issue with a new Category 5 listing for bacteria in Silver Lake, Listing ID 6322. This listing appears to contradict itself in two parts of the text. It says the basis for the listing is 2004 data, and yet there were fewer than 5 samples so a geomean could not be done. In the remarks, it says that "Impairment was determined by exceedance of the geometric mean criterion in water year 2004, and the percent criterion in water year 2004. This is contradictory of the calculation of a geomean, which is needed	Per Policy 1-11 (2012) a percent can be used for Category 5 determination if "two or more samples exceed the criterion." Since 3 samples exceed the criterion the Category 5 determination meets the policy determination. The language in the listing erroneously contained reference to the geometric mean, and was removed. The data window for this assessment was data collected from 2001 up through 2010. Data older than the ten year

		to determine compliance. Also, this biological data is over 10 years old. Everett did intensive sampling in a number of lake locations when Silver Lake was listed in 1998, and had the listing removed as a result of more representative sampling (sampling plan was approved by Ecology). Why would Ecology now reach back 10 years to list? This data would be unrepresentative of current conditions.	window appear in a listing only if no more recent data exists to reassess the listing. It appears that the data the City of Everett is referring to is from 1999-2000, which is older than the 2004 data. Ecology has based the listing on the most current data available to us within the data window.
Everett	40791	The same sort of argument made for 6322 applies to a new Category 5 pH listing on North Creek. Data from 2004 is being used for a listing, when, since then, there have been 70 samples taken, and a single one has shown exceedance. Again, biological parameters can change rapidly, and this is again sampling done in Snohomish County and extrapolated back up into the section of the creek that would be dry in the summer except for the pumping done by Everett. This listing should be Category 2, for lack of recent evidence of a problem (one sample in 70 over 5 years is not a problem, it is a single anomaly!).	The Category 5 designation is based on data from 2004 and 2010 (it was assumed that the City of Everett was referring to listing 40791). An assessment unit is assigned a Category 5 designation for pH when at least three values in the dataset being considered do not meet the pH criteria and at least 10% of the values in a given year do not meet the criteria. The data window for this assessment was data collected from 2001 up through 2010. Data older than the ten year window appear in a listing only if no more recent data exists to reassess the listing.
Everett		Category 2 listing for the Sultan River erroneously used an outfall study well away from the river. The data used to place the Sultan at Category 2 were all non-detects, and therefore should not be utilized at all. This problem may exist for the rest of the Snohomish County Study that generated outfall data, and should be checked to avoid erroneous listing.	We appreciate your identification of this error; Ecology is working to remedy use of this type of data. All SNOCOOUTFALL440 listings based upon this location were inactivated during our quality control steps in May.
Everett		The entire Sultan River is proposed for listing as Category 2 for Chlorpyrifos, Endrin, Heptachlor, Parathion, Aldrin/Dieldrin, Hexachlorocyclohexane (Lindane), and Mercury. The listing basis is from a 2005 Snohomish County Study identified as 80400041. The Category 2 listings for the Sultan River should be removed. The data supporting the determination were incorrectly evaluated and the samples not representative of the larger water body. The City believes this study is only representative of the specific discharge and should not be used to represent a larger segment of the river. Because the study design was focused on specific discharges and not representative of large water body segments, the study is not appropriate for 303(d) listing determinations. Ecology should check to see if any of the other outfalls in the study were used to make inappropriate 303(d) determinations.	We appreciate your identification of this error. Ecology is working to remedy use of this type of data. All SNOCOOUTFALL440 listings based upon this location were inactivated during our quality control steps in May. We have removed all the listings with data for: aldrin/dieldrin, chlorpyrifos, endrin, heptachlor, hexachlorosyclohexane (Lindane), and parathion. We have examined the other data and locations for applicability.
Georgeson		Mason County Public Health (MCPH) is pleased to request that the Washington Department of Ecology (ECY) in collaboration with the US Environmental Protection Agency remove nine streams that are currently on the 303{d) list for fecal coliform. MCPH requests that the nine streams are reclassified as Category 1. Meets Tested Standards. The nine streams that currently meet the extraordinary water quality standard are Lilliwaup, Twanoh Falls, Stimson, Twanoh, Little Mission, Happy Hollow, Holyoke, Shoofly, and Mulberg. The three streams that did not meet the water quality standard are Trails End, Big Bend and Deveraux (See Appendix A: Table 1. Site Descriptions, Fecal Coliform 303{d) Listing ID, Hydrologic Unit Code and Site Locations for specific information on each stream and Appendix B: Monitoring Locations and 303(d) Listed Stream Maps). See original comment letter for more info.	There are an insufficient number of data points within the 2001 - 2010 assessment window to assess these streams for meeting the criterion. Bacteria data are assessed based upon water year, and 10 samples/sample dates within that water year are required to make a Category 1 assessment. The data are located in the EIM database and will be assessed during the next assessment cycle that incorporates the years included in the indicated study.
Idaho DEQ	73109	Listing ID: 73109, PRIEST RIVER, UPPER W.B. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. This AU and upstream contributing tributaries flow into waters which are Category 5 for temperature and sediment.	We appreciate you bringing this to our attention. The AU associated with the identified listings was terminated at the Idaho State border.
Idaho DEQ	8617	Listing ID: 8617, 11453, 11454, 11455, 16875 and 42518, PEND OREILLE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	11453	Listing ID: 8617, 11453, 11454, 11455, 16875 and 42518, PEND OREILLE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	11454	Listing ID: 8617, 11453, 11454, 11455, 16875 and 42518, PEND OREILLE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	11455	Listing ID: 8617, 11453, 11454, 11455, 16875 and 42518, PEND OREILLE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	16875	Listing ID: 8617, 11453, 11454, 11455, 16875 and 42518, PEND OREILLE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	42518	Listing ID: 8617, 11453, 11454, 11455, 16875 and 42518, PEND OREILLE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.

Idaho DEQ	8199	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	8200	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	9057	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	11393	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	11394	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	11395	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	11400	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	11401	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	16864	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	76007	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	76643	Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	71435	Listing ID: 71435, 73350, 76630, 77828, ROSE CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	73350	Listing ID: 71435, 73350, 76630, 77828, ROSE CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	76630	Listing ID: 71435, 73350, 76630, 77828, ROSE CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	77828	Listing ID: 71435, 73350, 76630, 77828, ROSE CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	70425	Listing ID: 70425, 71434, 73349, 76758, 76758, 77827, ROCK CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	71434	Listing ID: 70425, 71434, 73349, 76758, 76758, 77827, ROCK CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	73349	Listing ID: 70425, 71434, 73349, 76758, 76758, 77827, ROCK CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	76758	Listing ID: 70425, 71434, 73349, 76758, 76758, 77827, ROCK CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.

Idaho DEQ	77827	Listing ID: 70425, 71434, 73349, 76758, 76758, 77827, ROCK CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	71431	Listing ID: 71431, 73356, 76772, 77590, LITTLE HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	73356	Listing ID: 71431, 73356, 76772, 77590, LITTLE HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	76772	Listing ID: 71431, 73356, 76772, 77590, LITTLE HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	77590	Listing ID: 71431, 73356, 76772, 77590, LITTLE HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	41977	Listing ID: 41977, 41985, 41992, 50425, 73083, 76770, HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	41985	Listing ID: 41977, 41985, 41992, 50425, 73083, 76770, HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	41992	Listing ID: 41977, 41985, 41992, 50425, 73083, 76770, HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	50425	Listing ID: 41977, 41985, 41992, 50425, 73083, 76770, HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	73083	Listing ID: 41977, 41985, 41992, 50425, 73083, 76770, HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	76770	Listing ID: 41977, 41985, 41992, 50425, 73083, 76770, HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border.
Idaho DEQ	3737	Listing ID: 3737, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Please consider natural conditions provisions when evaluating temperature for the Spokane River. Modeling has demonstrated that Spokane River near the WA/ID border would be warmer under natural conditions then it is today.	The Assessment Unit associated with the identified listing was terminated at the Idaho State border. Ecology would need data/information verifying that the observed values are due to natural conditions and that anthropogenic sources are unlikely to contribute to the observed excursions before the Category 5 designations for the affected listings could be considered for removal based on natural conditions.
Idaho DEQ	14397	*Listing ID: 14397, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Please consider water column data and other new sources of data and reassess this AU for PCBs.*	The Assessment Unit associated with the identified listing was terminated at the Idaho State border. *Ecology gathered and analyzed all fresh water quality monitoring data (e.g., streams, rivers, and lakes) that had been collected through December 2010. Data collected in more recent years (after 2010) and submitted to Ecology, will be considered in the next Assessment, which we will begin as soon as EPA approves the proposed Assessment and Candidate 303(d) List.*
Idaho DEQ		Many AUs cross into Idaho. These AUs should be terminated AU at the Idaho/Washington state border. More Specific Comments to waters without AUs: In the Priest Lake HUC 17010215, Tributaries (Hughes Creek, Jackson Creek and Granite Creek) flow from Washington into Idaho. These waters flow into Hughes Creek watershed which is Category 5 for temperature. In the Priest Lake HUC 17010215, North Fork Granite Creek, and contributing tributaries including South Fork Granite Creek, flow from Washington into Idaho. These waters flow into North Fork Granite Creek which is Category 5 for temperature. In the Priest Lake HUC 17010215, Kalispell Creek and contributing tributaries flow from Washington into Idaho. These waters flow into Kalispell Creek which is Category 5 for temperature, and 4A for sediment. In the Priest Lake HUC 17010215, Skip Creek, Lamb Creek, and Binarch Creek flow from Washington into Idaho. These waters flow into waters which are Category 5 for temperature. Binarch Creek is Category 4A for sediment. In the Priest Lake HUC 17010215, Goose Creek, and contributing tributaries flow from Washington into Idaho. These waters flow into waters which are Category 5 for temperature and bacteria. In the Priest Lake HUC 17010215, Lower West Branch Priest River, and contributing tributaries flow from Washington into Idaho. These waters flow into Lower West Branch Priest River which is Category 5 for	As noted in the responses to Idaho DEQ's previous comments, we have terminated the extent of multiple assessment units at the Idaho border where they were unintentionally displayed as crossing the border. We intend to continue to work cooperatively with the State of Idaho to protect the water quality of all transboundary waterbodies.

		temperature and 4A for sediment. In the Pend Oreille HUC 17010305, Brickel Creek and contributing tributaries flow from Washington into Idaho. These waters flow into Brickel Creek which is Category 5 for "Combined Biota/Habitat Bioassessment" and 4C for physical substrate habitat alterations. In the Upper Spokane HUC 17010305, Fish Creek and contributing tributaries flow from Washington into Idaho. These waters flow into Fish Creek which is Category 5 for sediment and temperature. In the Upper Spokane HUC 17010305, Shaw Creek and contributing tributaries flow from Washington into Idaho. These waters flow into Hauser Lake which is Category 5 for total phosphorus. In the Upper Spokane HUC 17010305, Cable Creek and contributing tributaries flow from Idaho, to Washington, and back into Idaho. These waters flow into Hauser Lake which is Category 5 for Bacteria. +M64: Listing ID: 73109, PRIEST RIVER, UPPER W.B. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. This AU and upstream contributing tributaries flow into waters which are Category 5 for temperature and sediment. Listing ID: 8617, 11453, 11454, 11455, 16875 and 42518, PEND OREILLE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Listing ID: 3737, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Please consider natural conditions provisions when evaluating temperature for the Spokane River. Modeling has demonstrated that Spokane River near the WA/ID border would be warmer under natural conditions then it is today. Listing ID: 14397, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Assessments should be based on the past 5 years of data; The past 5 years clearly show that Mercury has not exceeded criteria. Ecology shows that there has been one exceedance of criteria in the last 22 years out of 57 samples, and that exceedance was between 1993 and 2001. Listing ID: 14397, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Please consider water column data and other new sources of data and reassess this AU for PCBs. Listing ID: 8199, 8200, 9057, 11393, 11394, 11395, 11400, 11401, 16864, 76007, 76643, SPOKANE RIVER. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Listing ID: 71435, 73350, 76630, 77828, ROSE CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Listing ID: 70425, 71434, 73349, 76758, 76758, 77827, ROCK CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Listing ID: 71431, 73356, 76772, 77590, LITTLE HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border. Listing ID: 41977, 41985, 41992, 50425, 73083, 76770, HANGMAN CREEK. This Assessment Unit (AU) extends into Idaho. Please terminate AU at the Idaho/Washington state border.	
Idaho DEQ	11397	Listing ID: 11397, SPOKANE RIVER. This Assessment Unit extends into Idaho. Please terminate Assessment Unit at the Idaho/Washington state border. Assessments should be based on the past 5 years of data; The past 5 years clearly show that Mercury has not exceeded criteria. Ecology shows that there has been one exceedance of criteria in the last 22 years out of 57 samples, and that exceedance was between 1993-2001.	We appreciate your identification of this oversight that occurred during our deployment of NHD. The Assessment Unit associated with the identified listing was terminated at the Idaho State border. There were no excursions in the most recent three years, with no excursions in the 17 sample events, therefore this listing has been changed to Category 1.
IEP	8207	Ecology should consider withholding PCB Category 5 designation based on Listing ID 8207. The basis for the listing is cited as "Washington Dept. of Ecology, 1995" reporting data in 1993-94. That data reference is to fish tissue samples from a location near Upriver Dam. The Assessment Unit for listing 8207 only extends to the middle of Section 1, Township 25 North, Range 43 East. This is east of Upriver Dam and the samples may not have been collected within the subject Assessment Unit. The second basis for the listing 8207 is "Johnson 1997" documenting a Rainbow Trout sample collected in 1996 at "Trent Road." This	We reviewed this monitoring location and determined that it is within the appropriate segment. Policy 1-11 (2012) states that (pg. 50) "where a general area is identified, but with no specific catch sites, the lowest downstream segment (rivers) or most probable centroid segment (open waters) will be placed in the appropriate category."

		sampling point appears to be well east of the Assessment Unit. Ecology should confirm that fish tissue data cited as the basis for Listing ID 8207 was collected within the subject Assessment Unit.	
Kapstone		KapStone supports the Weyerhaeuser Company's comments about the Columbia River Listings: ID #3784, ID #3788, ID #72805 and ID# 78120 and the Longview Ditches Listing ID# 7783.	Comment noted.
Kapstone		For the proposed temperature listings on the Columbia River mentioned above, KapStone urges Ecology to change them from Category 5 to Category 1, 2 or 3 given that the proposed listings are based on an incorrect water quality criterion of 17.5 °C as a 7-day mean of daily maximum temperatures; when the applicable temperature criterion for the Columbia River from its mouth upstream to Priest Rapids Dam (river mile 397.1) is 20.0 °C as a 1 day maximum. The proposed temperature listings for the sections of the Columbia River require determinations of ambient river temperature attributable to natural conditions and due to human activities. Therefore, Ecology lacks information to support a regulatory determination on possible impairment of the Columbia River temperature standard.	We appreciate your identification of an error that occurred while creating the Large River Assessment Units. The locations in question have been examined and assessed.
King County	70162	Borderline 2/5. Most recent data (2009, 11, 12 all in 2 range). Site dropped from program in 2013 b/c of lack of suitable riffles. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 2 or 3.	The proposed category designation is based on the data from the assessment period, 2001 through 2010. The data for this waterbody indicates impairment of the aquatic life use since the scores do not qualify for Category 1 or Category 2 and at least 2 years of the most recent 5 years of data indicate degraded biological integrity.
King County	70129	Site dropped from program in 2008 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70177	Site dropped from program in 2010 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. A review of the listing and application of current policy in response to public comment request has resulted in placement of the listing in Category 2. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70147	Site dropped from program in 2012 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70158	Site dropped from program in 2012 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70164	Site dropped from program in 2012 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70169	Site dropped from program in 2012 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.

King County	70171	Site dropped from program in 2012 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70183	Site dropped from program in 2012 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70186	Site dropped from program in 2012 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70128	Site dropped from program in 2012 b/c of insufficient riffle habitat. B-IBI score may not be reflective of true site or overall basin condition and a 5 listing may be unjustified without additional assessment. Recommend changing to a Category 3.	The sample was collected in accordance with the protocols in place at the time and therefore the B-IBI scores are considered to be valid. If more recent data/information is submitted to Ecology regarding the biological integrity of this assessment unit during the call for data for the next water quality assessment it will be used to update the listing basis; such data may result in a change in the impairment status of this assessment unit.
King County	70189	This should be a Category 2 listing, not a 5 based on the requirement that at least two years in five have an impaired condition. 2010 is the only year with B-IBI < =27 (24). All other years 2006-201 are in the 30-34 range.	The proposed category designation is based on the data from the assessment period, 2001 through 2010. The data for this waterbody indicates impairment of the aquatic life use since the scores do not qualify for Category 1 or Category 2 and at least 2 years of the most recent 5 years of data indicate degraded biological integrity (years 2008 and 2010 had scores below 28).
King County	70117	This should be a Category 5 listing based on low B-IBI in 2006, 2007, and 2010 (24, 24, 22). 2013 and 2014 data also support a Category 5 listing (26, 22).	The listing is now proposed for a Category 5 designation. The data for this waterbody indicates impairment of the aquatic life use since the scores do not qualify for Category 1 or Category 2 and at least 2 years of the most recent 5 years of data indicate degraded biological integrity.
King County	70161	This is a borderline site between Category 5 and Category 2 based on 2006-2010 data, however 2009-2014 data are strongly Category 2 (B-IBI 28-38); only 2006-2008 have low B-IBI scores below 27.	The listing will remain Category 5 because the scores do not qualify for Category 1 or Category 2 and at least 2 years of the most recent 5 years of data indicate degraded biological integrity. Data from after 2010 is not considered in this assessment but will be incorporated in the subsequent assessment.
King County	70080	This should be a Category 5 listing. 2008-2010 and 2013-2014 data with B-IBI between 24 and 26 support a 5 listing.	The listing will remain Category 2 because the bioassessment results do not demonstrate that the biological integrity of the benthic macroinvertebrate community is intact since the scores do not qualify for Category 1, but the scores also do not conclusively demonstrate degradation. Potential degradation is indicated when, using the lowest scores from each of the most recent five years in which data is available no more than one B-IBI score is less than or equal to 27, or no more than one RIVPACS score is less than 0.73. Data from after 2010 is not considered in this assessment but will be incorporated in the subsequent assessment.
King County		A number of segments in Lakes Washington and Sammamish and Lake Union/Ship Canal are proposed to change from Category 3 (Segment Lacks Sufficient Data) to Category 5 for pH. We have examined these data and they represent acute, transitory daily excursions. We believe this is a misapplication of the data which were used to categorize these waterbodies and that transitory pH fluctuations are due to natural conditions. Our long term trend analysis shows no change in trophic state index for any of these lakes which would corroborate a pH impairment decision.	The pH listing category determinations for the noted waterbodies/listings are consistent with the methodology for determining compliance with pH criteria statewide as specified in Policy 1-11. The state water quality standards do not specify a pH averaging period and therefore permit the use of instantaneous pH measurements in the evaluation of standards compliance. Policy 1-11 allows for 10% of daily values in a given year to exceed the applicable pH criteria and thus to a degree does account for periodic transitory excursions. Ecology would need data/information indicating that the observed values are due to natural conditions and that anthropogenic sources are unlikely to contribute to the observed excursions before the Category 5 designations for the affected listings could be removed.

King County	36166	Listing status is "modified" but it's unclear what was modified since these are marine listings which are unchanged since 2004. The basis for these listings appears to be a narrative criteria judgment based on data which is more than 10 years old. The decision to maintain these listings is unsupported by Policy 1-11 which states that "All tissue samples used for the Assessment must be from resident fish" and these listings are based on marine mammal tissue results. Recommend that this listing be changed to Category 2.	The listing is based on the application of narrative water quality standards intended to protect water quality for the wildlife habitat designated use. The Category 5 designation is based on a body of evidence that links human activities to the identified pollutant and probable harm to the marine organisms inhabiting the waterbody mammals as a result of the observed pollutant levels in the study organisms. The listing is not based on the application of fish tissue assessment methodology to marine mammals. This listing will remain a Category 5.
King County	36167	Listing status is "modified" but it's unclear what was modified since these are marine listings which are unchanged since 2004. The basis for these listings appears to be a narrative criteria judgment based on data which is more than 10 years old. The decision to maintain these listings is unsupported by Policy 1-11 which states that "All tissue samples used for the Assessment must be from resident fish" and these listings are based on marine mammal tissue results. Recommend that this listing be changed to Category 2.	The listing is based on the application of narrative water quality standards intended to protect water quality for the wildlife habitat designated use. The Category 5 designation is based on a body of evidence that links human activities to the identified pollutant and probable harm to the marine organisms inhabiting the waterbody mammals as a result of the observed pollutant levels in the study organisms. The listing is not based on the application of fish tissue assessment methodology to marine mammals. This listing will remain a Category 5.
King County	36168	Listing status is "modified" but it's unclear what was modified since these are marine listings which are unchanged since 2004. The basis for these listings appears to be a narrative criteria judgment based on data which is more than 10 years old. The decision to maintain these listings is unsupported by Policy 1-11 which states that "All tissue samples used for the Assessment must be from resident fish" and these listings are based on marine mammal tissue results.	The listing is based on the application of narrative water quality standards intended to protect water quality for the wildlife habitat designated use. The Category 5 designation is based on a body of evidence that links human activities to the identified pollutant and probable harm to the marine organisms inhabiting the waterbody mammals as a result of the observed pollutant levels in the study organisms. The listing is not based on the application of fish tissue assessment methodology to marine mammals. This listing will remain a Category 5.
King County	70172	Site 09MID1744 has very good-excellent scores which would place this site in Category 1. Only, 09MID1817 has scores potentially justifying Category 2. Policy 1-11 does not currently have effective guidelines for addressing conflicting information and addressing these circumstances should be considered during the next revision.	Comment noted. We have provided a rationale document for bioassessment listings in this Assessment and will use this as the basis for inclusion in Policy 1-11 prior to the next Assessment. We look forward to continued dialogue on these issues.
King County	70185	Agree based on 2006-2010 data; however, 2012-2014 data support a 1 listing (B-IBI ≥ 38)	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70166	Agree based on 2006-2010 data; however, 2012-2015 data support a 2 listing (B-IBI 28 to 30)	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70105	Agree based on 2006-2010 data; however, 2013 & 2014 data support a 1 listing (B-IBI 42)	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70102	Agree based on 2006-2010 data; however, 2013 and 2014 data support a 1 listing (B-IBI 42 & 44). B-IBI scores are highly variable at this site (low = 26, high =42).	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70130	Agree based on 2006-2010 data; However, 2013 and 2014 data support a 2 listing (B-IBI 30, 28).	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70114	Agree based on 2006-2010 data; however, 2013 and 2014 data support a 2 listing (B-IBI 34, 38).	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70078	Agree based on 2006-2010 data; however, 2009-2014 data (B-IBI 28-30) would result in a 2 listing; only 2006-2008 have B-IBI 27 or below.	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70127	Agree based on 2006-2010 data; however, 2011-2014 data support a 2 listing (all B-IBIs >=28)	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70100	Agree based on 2006-2010 data; however, 2012-2014 data support a 1 listing (B-IBI >=38)	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.

King County	70072	Agree based on 2006-2010 data, however 2012-2014 data support a 2 listing (B-IBI is 30 each year)	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	22321	Agree based on 2006-2010 data; however, 2013 and 2014 data for both 08LIT2488 & 08LIT2585 support a 2 listing (B-IBI 30, 28).	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	70175	Agree based on 2006-2010 data, however 2013-2014 data (B-IBI 28-32) would result in a 2 listing.	Comment noted. Data from 2011 - 2015 will be solicited during the call-for-data and compiled in EIM, which we plan to start as soon as EPA approves the 2014 Assessment and candidate 303(d) list.
King County	71233	King County's data excursions are likely due to natural processes. These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2006 and 2009. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	71262	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This pH listing was based on data from 2006, 2007, 2008, 2009, and 2010, and included both high and low readings. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72022	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This pH listing was based on data from 2004, 2005, 2006, 2007, and 2008, with pH readings both high and low. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72024	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2004, 2005, 2006, 2007, and 2008. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72025	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2006, 2007, 2008, 2009, and 2010. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72026	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2005, 2006, 2007, and 2008. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72027	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2005 and 2006.

		evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72028	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2004, 2005, and 2006. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72029	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2004, 2005, 2006 and 2007. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72030	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This pH listing was based on data from 2004, 2005, 2006, 2007, and 2008, with pH readings both high and low. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72031	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This pH listing was based on data from 2005, 2006, 2007, and 2008, with pH readings both high and low. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72032	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2004, 2005, 2006, 2007, and 2008. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72033	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2004, 2005, 2006, 2007, and 2008. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72034	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2006, 2007, 2008, 2009, and 2010. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72035	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2004, 2005, 2006,

		evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	2007, and 2008. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72036	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2005, 2006, 2007, and 2008. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72037	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This pH listing was based on data from 2004, 2005, 2006, 2007, and 2008, with pH readings both high and low. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72038	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2005 and 2006. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72039	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This pH listing was based on data from 2004, 2005, and 2006, with pH readings both high and low. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72040	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2004, 2005, and 2006. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72041	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2004, 2005, and 2006. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	72043	King County's data excursions are likely due to natural processes as trend analysis does not show a shift in trophic state index of the lake which would be indicative of a pH problem. (http://green2.kingcounty.gov/lakes/TSI.aspx) These natural processes do not appear to have been evaluated per Policy 1-11. Does not warrant listing as Category 5 but should instead be listed as Category 2 until such time as a pollutant can be identified.	This listing remains on Category 5 until such time that information is presented that validates natural conditions (see Policy 1-11 at page 21 for further guidance on making natural condition determinations). This high pH listing was based on data from 2005 and 2006. Ecology does not evaluate listings for natural conditions unless definitive information is provided to validate that human influences did not, or were not likely, to cause exceedances. In this case, high pH is considered the "pollutant" of concern.
King County	18878	This is one of a handful of bioassessment listings where the medium is "other" instead of water. Unclear what this suggests.	The field "medium" is intended to indicate the matrix from which a sample was drawn. The medium for all bioassessment listings has been changed to the type "other" since the

			medium field in the database does not contain "biology" as a selection and "water", "habitat", "tissue" and "sediment" are not entirely suitable as the medium type.
King County	18881	This is one of a handful of bioassessment listings where the medium is "other" instead of water. Unclear what this suggests.	The field "medium" is intended to indicate the matrix from which a sample was drawn. The medium for all bioassessment listings has been changed to the type "other" since the medium field in the database does not contain "biology" as a selection and "water", "habitat", "tissue" and "sediment" are not entirely suitable as the medium type.
King County	22323	This is one of a handful of bioassessment listings where the medium is "other" instead of water. Unclear what this suggests.	The field "medium" is intended to indicate the matrix from which a sample was drawn. The medium for all bioassessment listings has been changed to the type "other" since the medium field in the database does not contain "biology" as a selection and "water", "habitat", "tissue" and "sediment" are not entirely suitable as the medium type.
King County	22324	This is one of a handful of bioassessment listings where the medium is "other" instead of water. Unclear what this suggests.	The field "medium" is intended to indicate the matrix from which a sample was drawn. The medium for all bioassessment listings has been changed to the type "other" since the medium field in the database does not contain "biology" as a selection and "water", "habitat", "tissue" and "sediment" are not entirely suitable as the medium type.
King County	45372	These data were from pre-construction stormwater monitoring at the Brightwater Treatment Plant site. The former industrial site has since been cleaned up as part of the treatment plant construction. The water forming this tributary was monitored during construction and submitted to Ecology on DMRs. All copper results were less than 1.2 µg/L, should be Category 1.	According to the King County Website the Brightwater Treatment Plant came online in September 2011. This is outside of the assessment window. Please respond to Ecology's call for data in the next assessment cycle to ensure that the data has been shared between the programs and is assessed.
King County	45386	These data were from pre-construction stormwater monitoring at the Brightwater Treatment Plant site. The former industrial site has since been cleaned up as part of treatment plant construction. The water forming this tributary was monitored during construction and submitted to Ecology on DMRs. All mercury results were less than the 0.005 µg/L detection limit, should be Category 1.	According to the King County Website the Brightwater Treatment Plant came online in September 2011. This is outside of the assessment window. Please respond to Ecology's call for data in the next assessment cycle to ensure that the data has been shared between the programs and is assessed.
King County	47969	These data were from pre-construction monitoring of stormwater from the Brightwater Treatment Plant site. The former industrial site has since been cleaned up as part of treatment plant construction. The drainage/runoff which formed this tributary no longer exists as before and is now a constructed wetland draining via a culvert under State Route 9. Dissolved oxygen standards should not be applied to wetlands.	According to the King County Website the Brightwater Treatment Plant came online in September 2011. This is outside of the assessment window. Please respond to Ecology's call for data in the next assessment cycle to ensure that the data has been shared between the programs and is assessed.
King County	10667	• 0512 May 15 and June 5, 2006 max values were 8.7 - 8.8. April 2007 max value was 8.6. There has only been one "excursion" since 2008. May 2013 value reached 8.7 at the surface. • 0518 has not been sampled since 2008. June 5, 2006 max value was 9.0. April and May 2007 max value was 8.6. April 2008 max value was 8.9. • Does not meet Category 5 criterion of 3 excursions from all data AND at least 10% in a given year since 2007. Should be removed from Category 5. The periodic values above 8.5 are likely the result of spring plankton blooms and not a chronic pollution problem from a pollutant.	Per Policy 1-11 (2012) a Category 5 listing will be made from pH data when at least ten percent of the samples were excursions of the criteria in at least one year and at least 3 excursions from all data considered (2001 - 2010). The data for this listing meets the Category 5 listing requirements.
King County	7475	This appears to be a mistake. No excursions for pH at station 0309 according to King County data.	The listing was placed in Category 5 in 1996 based on 1994-1995 data submitted by the Muckleshoot Tribe. Per Policy 1-11 (2012) a Category 1 determination requires continuous monitoring data. The Category 5 determination will remain until continuous data are available to determine that the standards/criterion are being met.
King County	70191	Listing is OK, however this is NOT a KC_AmBug site as listed under EIM Study column. It is STMEcology site.	We appreciate you bringing this to our attention. The correct study identifier has been added: "WHM_WAM0."
King County	10655	Does not meet both parts of listing criteria. "A waterbody segment will be placed in Category 5 when a minimum of three excursions exist from all data considered, and at least ten percent of values in a given year do not meet the criterion". Does not have 10% excursions in a given year.	Per Policy 1-11 (2012) continuous or "daily value" data are required for placing in Category 1. This station had a 16.7%/2 excursions in 2004 and excursions in 2005, 2007, 2008, 2009, thus meeting the requirements for Category 5.
King County	12645	Has not violated both parts of Category 5 excursion criteria since 2004. ("A waterbody segment will be placed in Category 5 when a minimum of three excursions exist from all data considered, and at least ten percent of values in a given year do not meet the criterion.") Should not be listed.	Per Policy 1-11 (2012) continuous or "daily value" data are required for placing in Category 1. This station had a 15%/2 excursions in 2004 and 1 excursion in 2007, thus meeting the requirements for Category 5.
King County	51279	Has not violated both parts of Category 5 excursion criteria since 2007. ("A waterbody segment will be placed in Category 5 when a minimum of three excursions exist from all data considered, and at least ten percent of values in a given year do not meet the criterion.") Should not be listed.	Per Policy 1-11 (2012) continuous or "daily value" data are required for placing in Category 1. This station had a 25%/3 excursions in 2007, thus meeting the requirements for Category 5.
King County	52642	1 of 18 fish exceeded a tissue value back calculated from the NTR. The decision to change this from a Category 1 to a Category 5 based on this relatively low proportion of exceedances is not described in	The sample data used to make the assessment were based upon a COMPOSITE sample consisting of 3 fish where the average of those fillets exceeded the criterion. Other

		Policy 1-11 which appears to support a Category 2 choice: "A segment will be placed in Category 2 when any one single-resident fish sample exceeds the human health criteria and the segment is not otherwise listed in Category 5 for the pollutant." The Assessment Unit associated with the identified listing was terminated at the Idaho State border. EAP needs to relook at this listing to see if the last ten years show an exceedance. According to basis, the listing was based on data from 1993-2001 but it appears that there is data in this study up to 2009?	composite samples in this listing were for 3 - 5 fish in a composite sample, therefore Category 5 is the correct assessment rather than the Category 2 listing for a single fish.
King County	70189	This should be a Category 2 listing, not a 5 based on the requirement that at least two years in five have an impaired condition. 2010 is the only year with B-IBI < =27 (24). All other years 2006-201 are in the 30-34 range.	The data for this waterbody indicates impairment of the aquatic life use since the scores do not qualify for Category 1 or Category 2 and at least 2 years of the most recent 5 years of data indicate degraded biological integrity. A B-IBI score equal to or less than 27 and a RIVPACS score less than 0.73 indicates degraded biological integrity.
King County	70117	This should be a Category 5 listing based on low B-IBI in 2006, 2007, and 2010 (24, 24, 22). 2013 and 2014 data also support a Category 5 listing (26, 22).	It appears that the comment is addressing a different listing rather than listing 70117. The data for listing 70117 has led to a Category 5 designation. The listing has been placed in Category 5 because the two most recent data points indicate that biological integrity is degraded or because two or more B-IBI/RIVPACS data points in the most recent five data points indicate biological degradation and the scores do not qualify for Category 1 or Category 2. A B-IBI score ≤ 27 and a RIVPACS score less than 0.73 indicates degraded biological integrity.
King County	36171	The basis for these listing appears to be of the narrative criteria which is unsupported by Policy 1-11 as there is no documentation that tissue concentrations exceeded values derived from the NTR or that these necoplasms impacted designated uses.	The original listing was made in 2004 for this marine location; the listing went through a public comment period and has been approved by the EPA. Because we did not pull marine data for the assessment, we do not know if there is any newer data to determine that this should move out of Category 5. Ecology appreciates your input; we plan to assess marine water data during the next assessment cycle.
King County	51262	These data were from pre-construction monitoring of stormwater from the Brightwater Treatment Plant site. The former industrial site has since been cleaned up as part of treatment plant construction. The drainage/runoff which formed this tributary no longer exists as before and is now a constructed wetland draining via a culvert under State Route 9. pH standards should not be applied to wetlands.	According to the King County Website the Brightwater Treatment Plant came online in September 2011. This is outside of the assessment window. Please respond to Ecology's call for data in the next assessment cycle to ensure that the data has been shared between the programs and is assessed.
Kirkland	78104	Clarify the location for this listing. Map shows it as Forbes Creek, titled as "unnamed Creek tributary to Lake WA", and assessment unit ID is "unmappable", and the reach components are non-standard (all listed as 00000000000001).	The identified listing is not for Forbes Creek. The map highlights the Section in which the hydrologic feature is located since it is not in the NHD line work and is therefore non-mappable. The associated EIM study is C0900063 and the EIM station is KC_446-86. The location description is "outflow of pipe W of 99th Ave E". Review of the listing indicates that the data appear to have been collected from a stormwater outfall rather than a stream. Therefore, this listing has been found to be invalid and has been removed from the assessment.
Kirkland	73130	Clarify the location for this listing. Map shows it as Forbes Creek, titled as "unnamed Creek tributary to Lake WA", and assessment unit ID is "unmappable", and the reach components are non-standard (all listed as 00000000000001).	The identified listing is not for Forbes Creek. The map highlights the Section in which the hydrologic feature is located since it is not in the NHD line work and is therefore non-mappable. The associated EIM study is C0900063 and the EIM station is KC_446-86. The location description is "outflow of pipe W of 99th Ave E". Review of the listing indicates that the data appear to have been collected from a stormwater outfall rather than a stream. Therefore, this listing has been found to be invalid and has been removed from the assessment.
Kirkland	74790	Clarify the location for this listing. Map shows it as Forbes Creek, titled as "unnamed Creek tributary to Lake WA", and assessment unit ID is "unmappable", and the reach components are non-standard (all listed as 00000000000001).	The identified listing is not for Forbes Creek. The map highlights the Section in which the hydrologic feature is located since it is not in the NHD line work and is therefore non-mappable. The associated EIM study is C0900063 and the EIM station is KC_446-86. The location description is "outflow of pipe W of 99th Ave E". Review of the listing indicates that the data appear to have been collected from a stormwater outfall rather than a stream. Therefore, this listing has been found to be invalid and has been removed from the assessment
Kirkland	78106	Clarify the location for this listing. The Assessment Unit ID says "unmappable", the Reach components are non-standard (all listed as 00000000000001), and the map links to Totem Lake which does not drain to Sammamish River.	The associated EIM study is C0900063 and the EIM station is KC_A3019. The location description is "outfall at N end of Big O Tires behind garbage container N of NE124th St". Review of the listing indicates that the data appear to have been collected from a stormwater

			outfall rather than a stream. Therefore, this listing has been found to be invalid and has been removed from the assessment.
Kirkland	73131	Clarify the location for this listing. The Assessment Unit ID says "unmappable", the Reach components are non-standard (all listed as 00000000000001), and the map links to Totem Lake which does not drain to Sammamish River.	The associated EIM study is C0900063 and the EIM station is KC_A3019. The location description is "outfall at N end of Big O Tires behind garbage container N of NE124th St". Review of the listing indicates that the data appear to have been collected from a stormwater outfall rather than a stream. Therefore, this listing has been found to be invalid and has been removed from the assessment.
Kirkland	74791	Clarify the location for this listing. The Assessment Unit ID says "unmappable", the Reach components are non-standard (all listed as 00000000000001), and the map links to Totem Lake which does not drain to Sammamish River.	The associated EIM study is C0900063 and the EIM station is KC_A3019. The location description is "outfall at N end of Big O Tires behind garbage container N of NE124th St". Review of the listing indicates that the data appear to have been collected from a stormwater outfall rather than a stream. Therefore, this listing has been found to be invalid and has been removed from the assessment.
Kirkland	70086	It is more reasonable for bioassessment to be a parameter to lead to a Category 4C, not a Category 5, since there is not a TMDL for bioassessment. It is unreasonable to propose this reach as a Category 5, and make the jurisdiction perform extensive pollutant testing based solely on low BIBI scores, since those can be dependent on parameters other than pollutants. In addition, the bioassessment parameter for this reach is based on BIBI data from 2010 and before, but standardized biological data testing procedures were not in place until 2012.	EPA 2006 Integrated Report Guidance clearly states that if a designated use is not supported and the segment is impaired or threatened, the fact that the specific pollutant is not known does not provide a basis for excluding the segment from Category 5. The guidance also states that those segments must be listed unless the state can demonstrate that no pollutant(s) causes or contribute to the impairment. EPA guidance further states that upon further study, if the assessment of the new data and information demonstrates that the use impairment is not associated with a pollutant and is attributable only to other types of pollution (e.g., flow or habitat alteration) the segment may be placed into Category 4C. The standardized sampling methodology is required for samples collected in 2012 and later; pre-2012 data used in the assessment met the quality assurance requirements in place at the time and are considered to be valid results.
Kirkland	70088	It is more reasonable for bioassessment to be a parameter to lead to a Category 4C, not a Category 5, since there is not a TMDL for bioassessment. It is unreasonable to propose this reach as a Category 5, and make the jurisdiction perform extensive pollutant testing based solely on low BIBI scores, since those can be dependent on parameters other than pollutants. In addition, the bioassessment parameter for this reach is based on BIBI data from 2010 and before, but standardized biological data testing procedures were not in place until 2012.	EPA 2006 Integrated Report Guidance states that if a designated use is not supported and the segment is impaired or threatened, the fact that the specific pollutant is not known does not provide a basis for excluding the segment from Category 5. The guidance also states that those segments must be listed unless the state can demonstrate that no pollutant(s) causes or contribute to the impairment. EPA guidance further states that upon further study, if the assessment of the new data and information demonstrates that the use impairment is not associated with a pollutant and is attributable only to other types of pollution (e.g., flow or habitat alteration) the segment may be placed into Category 4C. The standardized sampling methodology is required for samples collected in 2012 and later; pre-2012 data used in the assessment met the quality assurance requirements in place at the time and are considered to be valid results.
Kirkland	12206	It is not reasonable to have a TMDL for a large water body like Lake Washington. We should focus TMDLs on streams and outfalls draining into Lake WA.	Comment noted.
Kirkland	72040	It is not reasonable to have a TMDL for a large water body like Lake Washington. We should focus TMDLs on streams and outfalls draining into Lake WA.	Comment noted.
Kirkland	74350, 71261	This is an ornamental pond for the Woodlake Apartments. It is not a natural lake, stream, or part of a natural drainage system so a TMDL is not reasonable. Listing IDs: 74350, 71261	The state water quality standards at 173-201A-010(2) describe waters covered under the standards to include lakes, rivers, ponds, streams, inland waters, marine waters, wetlands, and all other surface waters and water courses within the jurisdiction of the state of Washington. High levels of bacteria are unhealthy for humans who may come in contact with that water, and as such steps should be taken to eliminate or minimize bacterial sources. Given the description of a confined pond, a TMDL is likely not necessary if the source(s) can be readily identified and eliminated or minimized. Otherwise, the need for a TMDL will be prioritized by Ecology's Northwest Regional Office.
Kitsap County	74857	There is no stream highlighted on the map view	The waterbody is not contained in the NHD dataset because of its small size. Since there was no stream line to highlight in the online mapviewer, we instead mapped the Township, Range, and Section in which the data was collected (the data was collected at the mouth of the creek in the intertidal zone). The assessment unit consists of the entire length of Phinney

			Creek from its headwaters downstream to its mouth, located at the southern terminus of Phinney Bay.
Kitsap County	38432	Request moving to 4B due to Kitsap PIC program is the local control program	The identified listing has been moved to Category 4B because the impairment is being addressed by the Kitsap PIC program.
Kitsap County	38460	Request to 4B - Kitsap Health PIC program is the local pollution control plan	The identified listing has been moved to Category 4B because the impairment is being addressed by the Kitsap PIC program.
Kitsap County	74857	Move to 4A - has a TMDL (Dyes/Sinclair)	Listing 74857 has been rolled into listing 53076, which is in Category 4A. There should have been only be a single listing for this creek as the data in both listings are from the same location.
KPHD	53116	Located in Colvos Passage	Wilson Creek discharges into Colvos Passage. The data is from a station located just upstream of the mouth of Wilson Creek
KPHD	74857	INCLUDED IN DYES/SINCLAIR TMDL	Listing 74857 has been rolled into listing 53076, which is in Category 4A. There should have been only be a single listing for this creek as the data in both listings are from the same location.
KPHD	38432	request 4B	This listing is in Category 4B.
KPHD	38460	request 4B	This listing is in Category 4B.
KPHD	74665	KPHD PIC PROJECT IN PROGRESS	This listing is in Category 4B.
KPHD	38512	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	74250	KPHD DATA SAYS MEETS STANDARD	Department of Ecology did not find any KPHD monitoring stations on the indicated assessment unit. Stations were found in upstream and downstream locations.
KPHD	39984	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	39985	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	39986	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	38385	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	39989	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	39990	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	15731	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where

			both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40015	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40018	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	38787	DOH MW data shows standard met	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40019	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40022	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40023	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40024	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40025	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40028	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40004	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40005	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	38783	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.

KPHD	53111	KPHD DATA SAYS MEETS STANDARD	There are identified excursions of the 100 col/100 mL criterion sufficient to determine the Category 2 listing (per Policy 1-11 [2012]) in 2006. This assessment unit is within the contributing area to listing 53110, which is in Category 4B for bacteria (Kitsap County Bacteria 4B). Due to the proximity and contribution of bacteria loads, this Assessment Unit will remain in Category 2 (Waters of Concern) as there are identified excursions of the 100 col/100 mL criterion sufficient to contribute to the downstream assessment unit.
KPHD	13932	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	15732	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	23698	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	38726	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40117	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40120	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40125	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40128	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40132	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	52900	KPHD DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	38699	KPHD DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.

KPHD	38750	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	38754	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40139	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40143	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40148	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	40155	DOH DATA SAYS MEETS STANDARD	The comment applies to data for marine waters, which were not assessed during this assessment cycle. Per Policy 1-11 (2012), at least 10 samples during a water year where both the percent and the geometric mean do not exceed the criterion are required for a Category 1 listing.
KPHD	74681	INVESTIGATIVE SAMPLING, SHOULD NOT BE LISTED	The data indicates that there are excursions within this assessment unit for bacteria. The data indicates that these waters are of concern (Category 2), but are not considered as being impaired or on the 303(d) list (Category 5).
KPHD	74683	INVESTIGATIVE SAMPLING, SHOULD NOT BE LISTED	The data indicates that there are excursions within this assessment unit for bacteria. The data indicates that these waters are of concern (Category 2), but are not considered as being impaired or on the 303(d) list (Category 5).
KPHD	74685	INVESTIGATIVE SAMPLING, SHOULD NOT BE LISTED	The data indicates that there are excursions within this assessment unit for bacteria. The data indicates that these waters are of concern (Category 2), but are not considered as being impaired or on the 303(d) list (Category 5).
KPHD	74690	INVESTIGATIVE SAMPLING, SHOULD NOT BE LISTED	The data indicates that there are excursions within this assessment unit for bacteria. The data indicates that these waters are of concern (Category 2), but are not considered as being impaired or on the 303(d) list (Category 5).
KPHD	74691	INVESTIGATIVE SAMPLING, SHOULD NOT BE LISTED	The data indicates that there are excursions within this assessment unit for bacteria. The data indicates that these waters are of concern (Category 2), but are not considered as being impaired or on the 303(d) list (Category 5).
KPHD	7658	KPHD DATA SAYS MEETS STANDARD	Ecology could not identify any KPHD data within the Assessment Unit (17110019012739) that corresponds to this listing.
KCWP	50664	Listing #50664 (incorrectly labeled on your maps and assessment materials as Wipple Wasteway), had "excursions" for pH on 4 of 13 sample dates in 2000, with no excursions in 2001. This segment of the Kittitas Reclamation District's Turbine Ditch Canal has NO connection to natural waterways, and there is no impairment to any irrigation use.	This listing will remain in Category 5 in accordance with Policy 1-11. At least 10 percent of samples were excursion of the criteria in at least one year and at least 3 excursions exist from all data considered.
KCWP	50704	Listing #50704, which again notes a total of four excursions for pH in 2000 (3) and 2001 (1). This segment of the Cascade Irrigation District canal is a few hundred yards long, and is the irrigation diversion from the Yakima River. That is, the water in the designated reach is coming directly from the river. Further, throughout the listed stretch, there is no connection to any natural waterways.	This listing will remain in Category 5 in accordance with Policy 1-11. At least 10 percent of samples were excursion of the criteria in at least one year and at least 3 excursions exist from all data considered.

Klickitat County		Station WQ-2A (which is just 1.5 miles upstream of WQ-2) clearly meets both the 17.5 degrees C temperature criterion (which was applicable in 2010) and the 16 degrees C temperature criterion, which might be applicable in the water quality assessment applicable to conditions after October 2011. It is not appropriate to extend a Category 5 water quality over a length of Buck Creek delineated in the proposed water quality assessment. A Category 5 temperature listing, might, however, appears to be appropriate for the former Northwestern Lake.	The proposed category designation for Listing 21594 has been changed from Category 5 to Category 3 in recognition that the temperature data leading to the Category 5 designation was collected from a portion of Buck Creek that was inundated due to the Condit dam and with the removal of the dam the data is not likely to represent current hydrological characteristics in lower Buck Creek. It is important to note that an assessment unit is the smallest unit of a waterbody to which standards can be applied. Water quality standards violations at any point along an assessment unit (e.g. an NHD reach) result in a Category 5 designation for the entire assessment unit, regardless of whether or not monitoring at another station along the assessment unit shows that standards are being met at that station.
Klickitat County	72908	Klickitat County would like to submit comments on your proposed Category 5 temperature listings for the Klickitat River (Listing ID 72908- Temperature) and (Listing ID 77924- Dissolved Oxygen). The county believes the Category 5 listing is not appropriate for Klickitat River. This listed reach is partially in the backwaters of the Columbia River and partially in the free flowing segment of the River. The NHD reaches should be split so that the backwater is delineated using the NHD polygon feature for the Columbia River subject to the (Water Quality Assessment Units for the Columbia and Snake Rivers- March 18) This would more closely align to the NHD hydrography it contains. The area from the lowest extent of the free flowing river up to Silva Creek should be its own reach.	The entire assessment unit associated with listings 70982, 73489, and 77405 is considered to be within the inundation zone of the Columbia River backwaters. The water quality criteria applicable to the portion of the Columbia River into which this waterbody flows apply to this assessment unit. Listing 73489 has been placed in Category 2 due to an observed exceedance of the Columbia River temperature criterion. The upstream assessment unit associated with listings 72908 and 77924 is not presently considered to be within the Columbia River inundation zone; no changes have been made to these listings.
Klickitat County	72908, 77924	According to the GPS location for Listings 72908 and 77924 the monitoring location is clearly in the area inundated by the Bonneville Pool with the assessment results becoming a part of the NHD hydrograph for the Columbia River.	The entire assessment unit associated with listings 70982, 73489, and 77405 is considered to be within the inundation zone of the Columbia River backwaters. The water quality criteria applicable to the portion of the Columbia River into which this waterbody flows apply to this assessment unit. Listing 73489 has been placed in Category 2 due to an observed exceedance of the Columbia River temperature criterion. The upstream assessment unit associated with listings 72908 and 77924 is not presently considered to be within the Columbia River inundation zone; no changes have been made to these listings.
Klickitat County	72898	Klickitat County would like to submit comments on your proposed Category 5 temperature listing for the White Salmon River (Listing ID 72898). The county believes the Category 5 listing is not appropriate for White Salmon River. The temperature monitoring location was/is within the backwater of the Bonneville pool and therefore should not be attributed to the White Salmon River. This should be a classification for the Columbia River and subject to the (Water Quality Assessment Units for the Columbia and Snake Rivers- March 18) and be delineated using the NHD polygon features throughout the slack waters and not the White Salmon River. This would more closely align to the NHD hydrography it contains.	The assessment unit has been split at the location where the inundation zone appears to end. Listings 47414, 51055, 72330, and 72898 address the portion of the river within the inundation zone. The water quality criteria applicable to the portion of the Columbia River into which this waterbody flows apply to this modified assessment unit. Listing 47414 has been placed in Category 2 due to an excursion from the Columbia River dissolved oxygen saturation criterion. The proposed Category 5 designation for Listing 72898 remains unchanged because the Columbia River temperature criterion of 20 degrees Celsius has been exceeded.
Klickitat County	21594	Klickitat County believes that the proposed Category 5 listing for Buck Creek (Listing ID 21594) is not appropriate for multiple reasons and requests that the listing remain as a Category 3 for insufficient data.	The proposed category designation for Listing 21594 has been changed from Category 5 to Category 3 in recognition that the temperature data leading to the Category 5 designation was collected from a portion of Buck Creek that was inundated due to the Condit dam (i.e. in backwaters at the mouth of Buck Creek due to dam storage on the White Salmon River) and with the removal of the dam the data is not likely to represent current hydrological characteristics in lower Buck Creek.
Klickitat County		Temperature monitoring station WQ-2 was influenced by Northwestern Lake, the impoundment behind Condit Dam, and is not representative of the free flowing reaches of Buck Creek. The GPS location of the logger can clearly be seen to be in the backwaters of the dam impoundment. The location of the temperature monitor was scoured out with the removal of the dam suggesting that the influence was significant. The location of the Logger was scoured out 4.5 feet (Photo I. A). The mouth of buck creek itself dropped over 20 feet. (photo 2.A)	The proposed category designation for Listing 21594 has been changed from Category 5 to Category 3 in recognition that the temperature data leading to the Category 5 designation was collected from a portion of Buck Creek that was inundated due to the Condit dam (i.e. in backwaters at the mouth of Buck Creek due to dam storage on the White Salmon River) and with the removal of the dam the data is not likely to represent current hydrological characteristics in lower Buck Creek.
Lengenfelder		The Lake has always been high in phosphorus. Has the underlying natural conditions been changed in order to list Capitol Lake as a category "5" for phosphorus?	Capitol Lake has been listed as impaired by total phosphorous levels in each water quality assessment since 1996 because levels consistently exceed the action level of 20µg/L. We do not disagree that phosphorous levels may be naturally elevated, however, conclusive data/information indicating that human sources do not significantly contribute to the observed

			phosphorous levels would be needed in order to remove the Category 5 designation for the lake.
Lengenfelder		In looking at the "revised" data I question why Capitol Lake and Capitol Lake (Southern basin) has not been updated. Data listed shows these lake sections as a "5" for bacteria and Total phosphorus. Thurston County Health Dept.'s testing program says it has met the water quality standard for the past 10+ years. Their test include specifically looking at bacteria.	At this time there are not sufficient data to determine if Capitol Lake is meeting the requirements to change from a Category 5 designation to Category 1. Per Policy 1-11 (2012), at least 10 data samples from the critical time of year, where both the percent and the geometric mean do not exceed the criterion, are required for this change in listing.
Liberty Lake	17484	We would like Ecology to reconsider the proposed Category 5 listing on Liberty Lake, Spokane County, for PCBs in the Draft 303(d) Freshwater Assessment. In a 2006 report by Ecology looking at pre-release Rainbow Trout (a commonly stocked fish in Liberty Lake), it found that fish tissue sample concentrations varied widely, both above and below the human health criteria for PCBs, in sampled hatchery fish. Many other studies of regional hatchery facilities also show high variability in test results of fish tissue. Given the vast numbers of hatchery grown and fed fish, put into Liberty Lake over the years, WDFW and Ecology should consider assessing the most probable source of PCBs into Liberty Lake and other similar bodies of water, the annually introduced fish population which becomes part of a living and vibrant food web causing bioaccumulation of more PCBs. Furthermore, this 2006 report recommended that Ecology consider looking at hatchery fish as a possible point source of PCBs into 303(d) listed waters when other point sources were not present. One other variable that Ecology should more thoroughly consider before listing Liberty Lake as a Category 5 for PCBs, is the extremely small sample size this waterbody listing is based on, 3 fish. These 3 fish cannot be representative of the entire fish population of Liberty Lake, not the 3's respective species, and most certainly not the entire 716 Acre waterbody. Based on Ecology's own SOP for this listing process, this sample is not credible, and therefore not enough to support a 303(d) listing. The proposed Category 5 listing ID 17484, should be reconsidered until Ecology provides a more complete picture of the PCB dynamics in and out of the Liberty Lake watershed before triggering a full-blown TMDL. A significant component of this dynamic has been largely ignored, a fact we all agree on.	Listing 17484 is an existing Category 5 listing as opposed to a new listing and the basis of the listing is the same that was present in the 2008 water quality assessment. The data supporting the Category 5 designation exceeds the Category 5 listing criteria outlined in Policy 1-11. All of the available data (three separate composite samples of tissue involving two different fish species and two separate sampling years) support the conclusion that PCBS in fish tissue do not meet water quality standards in Liberty Lake. Since this is an existing Category 5 listing, new data showing that PCBS do not exceed the applicable criteria would be needed in order to place the listing into a different category. A similar comment was submitted on this listing by the Liberty Lake Sewer and Water District on the 2008 water quality assessment. The Liberty Lake Sewer and Water District expressed concern that hatchery stocking is a source of the PCBs found in the lake. The purpose of the Water Quality Assessment is to highlight areas of pollution requiring further investigation, up to and including a Water Quality Improvement Report (also known as a total maximum daily load, or TMDL). The presence of pollutants in tissue or water column samples can lead to 303(d) listings in a waterbody based on the assessment of available monitoring data. These remain on the 303(d) list until human-caused factors can be ruled out or a TMDL is in place. The National Toxics Criterion for PCBs, as a total, is 5.3 µg/Kg. Data from the 2005 study of the Washington State Toxics Monitoring Program (WSTMP) documented three composite samples of smallmouth bass (Micropterus dolomieu) in Liberty Lake exceeding the National Toxics Criterion for the presence of total PCBs. Keith Seiders, lead author for the 2005 WSTMP study, noted that Ecology performed a study of Washington Department Fish and Wildlife (WDFW) hatcheries in 2005. The study, titled 'Persistent Organic Pollutants in Feed and Rainbow Trout from Selected Trout Hatcheries' (http://www.ecy.wa.gov/biblio/0603017.html), addressed questions about hatcheries as potential sources of contaminants. According to WDFW staff member Chris Donley, walleye fry have been stocked in Liberty Lake. The majority of Liberty Lake walleye were raised for seven to ten days before being transplanted, and were not fed at the hatchery. The only exception to transplanted walleye size was in 2000, when 20,000 fingerlings were stocked in the lake. The WDFW does not stock other warmwater species (such as smallmouth bass) in Liberty Lake. Keith Seiders stated that the brown trout collected in 2001 were fish between 4 and 5 years of age. This age of stocked trout generally has spent multiple years growing after planting, increasing the likelihood that they accumulated their PBC burden in Liberty Lake. Mr. Seiders also noted, "PCBs are commonly found throughout the environment, even in fish from lakes far from population sources. Ecology is trying to better understand this through a current study 'PCB and Dioxin Levels in Resident Fish from Washington Background Lakes and Rivers' (http://www.ecy.wa.gov/biblio/0803102.html)." The Water Quality program encourages the Liberty Lake Sewer and Water District to submit water quality data in accordance with the Department of Ecology's EIM system requirements. Monitoring data may provide the Department of Ecology and local governments a clearer picture of potential sources of toxics contaminates, such as PCBs, to Liberty Lake. The Water Quality Department will assess submitted data according to the Water Quality Program Policy 1-11 (www.ecy.wa.gov/programs/wq/303d/wqp01-11-ch1_final2006.pdf).

Loehr	8737	Sufficient basis is provided in the remarks to not list this as Cat 2 anymore. Parathion no longer used and recent sampling has not found.	The listing has been moved to Category 3 based on the remark in the listing made by Ecology staff in 2003.
Loehr	35504	Old data point, and Parathion no longer used. Remove from Cat 2.	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	35503	Pretty old data, and Parathion no longer used. Get rid of this listing.	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	8999	The data point is 44 years ago! This simply needs to come out. Keeping it in doesn't pass the smirk test.	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	8982	The listing needs to be removed. 44 year old data can't purport to be representative of today, or even be a basis for any concern.	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	8977	44 year old data point, can't be any concern! Keeping it in because of the policy is a lame excuse.	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	9012	Based on very old data, that Ecology even acknowledged in 2003 is highly questionable. Get rid of the listing based on common sense. The water in question entered the Pacific 45 years ago.	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	8870	As I look at all the Aldrin listings, it becomes painfully clear that most are based on very old data, that Ecology questions, and in this listing Ecology demonstrates it doesn't meet QA/QC. These data should not be used as a basis for any listing, including Category 2.	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	8837	As with the other Aldrin listings I have commented on, it's time for this one to just go away. The data pre-date the Clean Water Act!	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	11918	I can't believe King County doesn't have any newer data.	Since there is no newer data that we have been made aware of, data older than ten years is considered the most recent. Listing will continue to be shown in Category 5 in accordance with Policy 1-11 until newer data is available for assessment of this waterbody segment.
Loehr	8868	Ancient data. Can't be representative of today. Don't use data and don't list as Cat. 2.	This listing has been reviewed and moved to Category 3 for insufficient information on which to make a category determination or validate appropriate QA requirements were met.
Loehr	48352	The river is the outlet flow from Lake Pend Oreille which is naturally thermally stratified in the summer. The temperatures exceed numeric criteria but meet the natural condition component. Ironically, the effect of the border dam was to raise the level of the lake in Idaho in the summer which means that the water drawn to the outlet stream could come from deeper water than before the dam, so the river at this location actually is cooler than the natural condition. TMDL studies essentially confirmed this. Change to Category 1.	Listing 48352 is included in a temperature TMDL and is awaiting approval by EPA. Once EPA takes action on the TMDL, Ecology will make necessary changes to the listing categories based on newer data assessed and actions that have occurred. We note that the Pend Oreille River is a complex system that requires consideration of different flow regimes now compared to under natural conditions; warm water temperatures lasting longer into the fall now due to the greater volume of water; and the requirement to meet the Kalispel Tribe's temperature criteria.
Loehr	6746	Believe dissolved oxygen levels to be natural condition without human degradation. Aerial imagery looks like no credible human impacts. Suggest change to Category 1 based on natural condition, or Category 2 because of possible/probably natural condition.	At this time we do not agree that it can be concluded that human influences are likely to have no significant effect upon dissolved oxygen levels in this assessment unit. There are both wetlands and timber management activities in the watershed that may have an effect upon dissolved oxygen levels. It would be more scientifically defensible to perform a formal analysis of the influence of human and natural conditions upon the dissolved oxygen levels in the assessment unit before attributing the dissolved oxygen criterion violations to natural conditions. Therefore, we do not believe that a change to the proposed category for listing 6746 is warranted at this time.
Loehr	6752	Same comment as for 6746. Believe dissolved oxygen concentrations to be natural. No apparent human causes from aerial imagery. Also, the Remarks section does not agree with the Basis section.	At this time we do not agree that it can be concluded that human influences are likely to have no significant effect upon dissolved oxygen levels in this assessment unit. We cannot change a Category 5 listing to a Category 2 or 1 based on anecdotal information alone. There are both wetlands and timber management activities in the watershed that may have an effect upon dissolved oxygen levels. It would be more scientifically defensible to perform a formal analysis of the influence of human and natural conditions upon the dissolved oxygen levels in the assessment unit before attributing the dissolved oxygen criterion violations to natural conditions. Therefore, we do not believe that a change to the proposed category for listing 6752 is warranted at this time.
Loehr	48919	Same comment for 48918. This is a classic example of a stream being warm because it is the outlet stream from the surface waters of a lake. Lakes warm up in the summer naturally, and become thermally	This assessment unit is directly below the Ozette Lake outlet. We agree that it is possible that the observed temperature exceedances in this assessment unit are due to natural

		stratified. Outlet streams will reflect the temperature of the surface waters of the lake. There is no feasible shading mechanism to apply to the lake to have any effect on this. Change to Category 1 based on natural, or 2 if you need to waffle, but there is no basis for Category 5. There are other lake outlet streams in the state that will behave similarly.	conditions. However, we cannot change a Category 5 listing to a Category 2 or 1 based on anecdotal information alone. Because of the prominence of the lake and its associated watershed it would be more scientifically defensible to perform a formal analysis of the influence of human and natural conditions upon the thermal regime of Ozette River before placing the listing in Category 1.
Loehr	4819	This stream is the outlet from Lake Ballinger. Lakes naturally warm up in the summer and become stratified. Outlet streams from lakes will naturally have elevated temperatures above the numeric temperature criteria. This will be a natural condition. Can't say whether or not human causes are adding more than 0.3 degrees C temperature to this stream, but given its closeness to the lake, it is most likely a natural temperature condition.	We agree that lakes are naturally warm in the summer. We do not agree that all lakes become stratified in the summer; thermal regimes in lakes are driven by the regional climate, lake bathymetry and watershed hydrology. We do not agree that outlet streams from all lakes will have water temperatures that are naturally elevated beyond any applicable numeric temperature criterion (which may vary by stream segment). Ecology staff in Ecology's Northwest Regional Office have indicated that for this waterbody there are likely to be additional factors affecting the natural temperature regime besides lake outflows, such as channel shading, air temperatures, and groundwater influx. Also, the watershed of Ballinger Lake appears to have a greater proportion of land cover as residential and commercial development than it does in natural vegetation; changes from natural vegetation to urban development may result in increases in the amount of nutrients, sediment, and heat in water entering the lake; this may affect the amount of heat absorbed by the lake from solar radiation and therefore affect the temperature of waters flowing out of the lake. Therefore, additional data on the thermal regime of this waterbody would be needed before water temperature criterion exceedances could be attributed solely to natural conditions.
Loehr	4819	I'd commented earlier that this was an outlet stream from a lake and the temperature condition is most likely natural associated with how lakes behave. Since the new listing approach goes confluence to confluence, this listing continues all the way downstream to where it meets Lyon Creek. This long stretch of stream is heavily shaded, so the heat in the system is likely due just to being the outlet stream of surface waters from a naturally stratified lake in the summer. TMDLs for temperature typically look to plant vegetation and add shading. That is however the condition right now (well vegetated/shaded). A TMDL to "improve" the stream temperature would be futile.	We do not agree that the source of heat contributing to the observed exceedance of the temperature criterion can be easily attributed to natural heating of Ballinger Lake and that extensive channel shading is strong evidence that an urban stream has naturally elevated water temperatures. Urban and residential development may cause decreased groundwater inputs, and decreased groundwater storage can lead to decreased groundwater inputs to streams during the dry season; decreased groundwater inputs can have a significant effect on the magnitude, frequency, and duration of observed water temperatures since a reduction in the volume of cold water inputs reduces the capacity for the stream to be buffered from thermal radiation. Urban streams are notorious for having altered hydrology and thermal regimes. The commenter is encouraged to review the available scientific literature on this topic.
Loehr	7704	Aerial imagery shows this segment to be well shaded by vegetation, and appears to not have human factors that would be able to elevate temperatures 0.3 degrees C above natural. Category 1 more likely. Perhaps it was less shaded 23 years ago when the temperature observations were made.	We do not agree that it can be concluded that human influences are likely to have no significant effect upon the thermal regimes of this assessment unit. Timber management activities in the watershed may have an effect upon the thermal regime as has been observed in other watersheds. Direct channel shading is only one of the factors that influences the thermal regime of a stream. Therefore, we do not believe that a change to the category for listing 7704 is warranted at this time.
Loehr	48346	When I click on the user study ID "PPIC0008", it indicates it is the Willipa River TMDL for fecals and dissolved oxygen. Very strange.....	The study ID was incorrect; it has been changed to PPIC0007
Longview	10434	The City of Longview submitted fecal coliform sampling data collected within the 2010 sampling window for the 2012 fresh water call for data; however the data was not included in the 2012 proposed assessment. Therefore, Longview is requesting this data be included (EIM Study ID: LVDITCH-2010; Result batch: 2012 Call for data EIMResultV2011.01final103012.xml) as it would change the water quality outcome. Although the City was delayed in getting the data into EIM and finalized, the City worked closely with Adam Oestreich of Ecology who was able to validate the final data in the EIM system. At this time, Ecology indicated things were progressing slowly with the water quality assessment, yet still moving ahead. Therefore Ecology was still interested in using this data for the 2012 assessment. Prior to our sampling efforts, several major sources of fecal coliform were identified through Longview's Stormwater Division IDDE Program and elimination through enforcement actions as well as voluntary cooperation with eventual installation of significant treatment technologies.	Data from the LVDITCH-2010 study were examined and a Category 1 determination was given the AU 10434. We appreciate your diligence and follow-through on both this project and clean-up, and ensuring the data were examined

Longview	7789	The City of Longview submitted fecal coliform sampling data collected within the 2010 sampling window for the 2012 fresh water call for data; however the data was not included in the 2012 proposed assessment. Therefore, Longview is requesting this data be included (EIM Study ID: LVDITCH-2010; Result batch: 2012 Call for data EIMResultV2011.01final103012.xml) as it would change the water quality outcome. Although the City was delayed in getting the data into EIM and finalized, the City worked closely with Adam Oestreich of Ecology who was able to validate the final data in the EIM system. At this time, Ecology indicated things were progressing slowly with the water quality assessment, yet still moving ahead. Therefore Ecology was still interested in using this data for the 2012 assessment.	Data from the LVDITCH-2010 study were examined and a Category 1 determination was given the AU 7789. We appreciate your diligence and follow through on both this project and clean-up, and ensuring the data were examined.
Muckleshoot		The lake and canal system forming the Lake Washington Ship Canal constitute the only route for anadromous salmonids migrating between the saltwater of Puget Sound and the Lake Washington Basin (including the Cedar and Sammamish sub-basins). During the summer months, water temperatures in the Ship Canal create a thermal barrier that impedes the migration of adult Chinook salmon (Oncorhynchus tshawytscha) and sockeye salmon (O. nerka) and late-migrating Chinook smolts. Water temperatures taken in July and August in Portage Bay at a monitoring station located near the downstream end of the Montlake Cut have been measured at or above 22oC throughout the entire water column. Upper areas of the water column may be as high as 25oC. During these times, water temperatures in the adjacent downstream waters of north Lake Union, although still unsuitable for salmonids, are often less extreme. Metalimnion temperatures in north Lake Union can be up to 3oC lower than the entire water column temperatures at the Portage Bay station. Prolonged exposure to elevated temperatures in both areas likely causes sub-lethal and potential lethal effects to adult salmon. The U.S. Army Corps of Engineers collects water temperature data at several stations in the Lake Washington Ship Canal. These data provide additional information on these water temperature impairments at several locations throughout the Lake Washington Ship Canal. Please see the link below for this additional data source for this waterbody. http://www.nwd-wc.usace.army.mil/nws/hh/basins/lkwash.html	Ecology concurs that periodically elevated water temperatures in Union Lake/Lake Washington Ship Canal likely pose a thermal barrier to salmon migration and therefore violate water quality standards (see WAC 173-201A-200 (c)(vii)(D)). A new Category 5 Listing (Listing ID: 79039) has been established to address this impairment.
NWPPA	72218	For several miles of the full width of the Columbia River (Lake Wallula), Ecology has proposed Category 5 listings for 4, 4'-DDE (identification number 72218) and PCBs (identification number 78816). The proposed listings are unwarranted and should be removed or designated as Category 2 (water of concern) or Category 3 (insufficient data). Both of the proposed listings are based on the analysis of a single smallmouth bass composite sample consisting of three individual fish collected in August 2003 at, apparently, one location (latitude 46.0226, longitude 118.9701). This location is downstream of the confluence of the Walla Walla and Columbia Rivers, although the proposed listings extend to an area of the Columbia River upstream of the confluence. In addition, the measured tissue concentrations exceeded the FTECs by only small amounts. The 4,4'-DDE concentration was 37.8 µg/kg, which is only 1.2 times the FTEC of 31.49 µg/kg. Although the total PCB concentration was 11.77 µg/kg, which is 2.2 times the FTEC concentration of 5.3 µg/kg, Ecology has found concentrations of more than the FTEC in fish from "background waterbodies." This has led Ecology to recommend that no action should be taken if tissue concentrations are less than 10 µg/kg. Thus, the measured PCB tissue concentration was less than 1.2 times this "no action" level. Given the disconnect described in the preceding section between the FTECs and water quality standards, these slight exceedances of the FTECs in a single sample do not warrant Category 5 listings. A single 11- year-old fish tissue sample cannot reasonably be relied on to reflect current 4,4-DDE and PCB conditions in the river.	Ecology currently depends on the numeric criterion to help calculate acceptable tissue concentrations for this determination. Current policy specifies that tissue data, as used, is acceptable for listing. Comments related to tissue can be considered at the next revision of Policy 1-11.
NWPPA	78816	For several miles of the full width of the Columbia River (Lake Wallula), Ecology has proposed Category 5 listings for 4,4'-DDE (identification number 72218) and PCBs (identification number 78816). The proposed listings are unwarranted and should be removed or designated as Category 2 (water of concern) or Category 3 (insufficient data). Both of the proposed listings are based on the analysis of a single smallmouth bass composite sample consisting of three individual fish collected in August 2003 at, apparently, one location (latitude 46.0226, longitude 118.9701). This location is downstream of the confluence of the Walla Walla and Columbia Rivers, although the proposed listings extend to an area of the Columbia River upstream of the confluence. In addition, the measured tissue concentrations exceeded the	Ecology currently depends on the numeric criterion to help calculate acceptable tissue concentrations for this determination. Current policy specifies that tissue data, as used, is acceptable for listing. Comments related to tissue can be considered at the next revision of Policy 1-11.

		FTECs by only small amounts. The 4,4'-DDE concentration was 37.8 µg/kg, which is only 1.2 times the FTEC of 31.49 µg/kg. Although the total PCB concentration was 11.77 µg/kg, which is 2.2 times the FTEC concentration of 5.3 µg/kg, Ecology has found concentrations of more than the FTEC in fish from "background waterbodies." This has led Ecology to recommend that no action should be taken if tissue concentrations are less than 10 µg/kg. Thus, the measured PCB tissue concentration was less than 1.2 times this "no action" level. Given the disconnect described in the preceding section between the FTECs and water quality standards, these slight exceedances of the FTECs in a single sample do not warrant Category 5 listings. A single 11- year-old fish tissue sample cannot reasonably be relied on to reflect current 4,4-DDE and PCB conditions in the river.	
NWPPA	3784, 3787, 7874, 72805	3784, 3787, 7874, and 72805: The proposed Columbia River temperature listings are based on an incorrect water quality criterion. The listings state that the applicable criterion is 17.5 °C as a 7-day mean of daily maximum temperatures. However, the applicable temperature criterion for the Columbia River from its mouth upstream to Priest Rapids Dam (river mile 397.1) is 20.0 °C as a 1 day maximum. See WAC 173 201A-602(1), Table 602, Columbia River notes 1 2. The criteria specified in Table 602 supersede criteria specified in WAC 173-201A-200 for the same parameter. Regardless whether applying the 20.0 °C criterion would change the proposed listing decisions, the decisions should be based on the correct criterion.	New data for this listing were originally assessed using the wrong criteria due to error in database tables for criteria exceptions which occurred during our creation of the Large River Assessment Units. This listing was reassessed using 20 degrees C. and 1-Day Max.
NWPPA	49044, 78120	The proposed Columbia River dissolved oxygen listings are based on an incorrect water quality criterion. The proposed listings are based on measured dissolved oxygen concentrations of less than 8 milligrams per liter (mg/L). However, the applicable dissolved oxygen criterion for the Columbia River from its mouth upstream to the Washington-Oregon border (river mile 309.3) is: "Dissolved oxygen shall exceed 90 percent of saturation." The proposed listings should be deleted or designated as Category 3 (insufficient data) in the absence of dissolved oxygen saturation data showing that the 90-percent-saturation criterion is not met.	We agree that the application of the 8mg/L criterion was a mistake. The data for both listings has been re-examined using the 90% of saturation dissolved oxygen criterion and we are working on revising the basis statements for the affected listings. The review found that the Category 5 designations for listings 49044 and 78120 are warranted per Policy 1-11 because there were three or more excursions from the criterion in all data considered and at least 10% of the values in a single year did not meet the criterion.
Pierce County	71279	This proposed listing and proposed listing 78049 for Inglin Ditch reference the same NHD Reach Code. The waterbody name could be updated to Inglin Ditch.	We appreciate you bringing this to our attention. Listings associated with an NHD reach code of 17110014001451 have been assigned the name "Inglin Ditch".
Pierce County	78250	This proposed listing and proposed listing 12585 refer to the same NHD Reach, which is more accurately described as a tributary to North Creek, not North Creek itself.	We appreciate you bringing this to our attention. Listings associated with an NHD reach code of 17110019006202 have been assigned the name "UNNAMED CREEK (TRIB TO NORTH CREEK) ".
Ponderay Newsprint	52622	Ecology proposes to revise the mercury listing of a station (listing ID 52622) from Category 1 to Category 5, based on mercury concentrations measured in a single composite tissue sample of northern pike minnows. Ecology continues to list three stations (listing IDs 43383, 52683 and 52935) as Category 5, based on PCB concentrations measured in various fish tissues. The PCB listings are unchanged since the 2012list. PNC questions the use of fish tissue data as a basis for listing state waters as impaired for water quality under Section 303(d) of the Clean Water Act. The state has no numeric tissue concentration criteria. To use tissue concentrations, Ecology needs to go through rulemaking to adopt tissue-based criteria and/or to adopt a means for establishing narrative criteria based on tissue concentrations. Tissue concentrations greater than fish tissue equivalent values calculated by Ecology do not demonstrate that numeric water quality criteria are exceeded.	Ecology currently depends on the numeric criterion to help calculate acceptable tissue concentrations for this determination. Current policy specifies that tissue data, as used, is acceptable for listing. Comments related to tissue can be considered at the next revision of Policy 1-11.
Port of Seattle	42309	The proposed listing for this reach is Category 5. This listing directly contradicts the recommendations from Ecology's own recent report on Des Moines Creek (Coots and Friese 2012). In the report, Ecology recommends that the 303(d) listing for dissolved copper be removed from the segment… The Port requests that Ecology review the data and verify that the 10/24/10 data was not double counted for the proposed listing. A single exceedance for copper over the three year study period does not meet the criteria for listing this segment as Category 5.	Listing 42309 was originally placed in Category 5 in the 2004 water quality assessment. In order to be removed from Category 5, the most recent data must show that the water quality criteria for copper are met, the basis for the Category 5 designation must be shown to be in error, or a TMDL must be completed (to move to Category 4A). Neither of these three justifications apply to listing 42309. The most recent data add additional confidence to the Category 5 designation. The chronic and acute criteria were exceeded at site DES 03 on 10/24/2010 and that the chronic criterion was exceeded at site DES 03 on 12/11/2010. A review of the 2012 Ecology report (Coots and Friese 2012) found that their recommendations for de-listing were based on an interpretation of the water quality standards, but did not incorporate considerations of Category designation requirements as outlined in Policy 1-11. The water quality study required under the Port of Seattle NPDES permit and associated site

			specific water quality objective are not a surrogate for the evaluation of whether or not ambient water quality in Des Moines Creek meets state water quality standards. Site specific water quality objectives do not equate to site specific water quality criteria, which must undergo a formal rule making process to become effectual. We acknowledge and appreciate the pollution control practices that the Port of Seattle has implemented in order to improve water quality. Meeting permit limits does not guarantee that water quality standards in a waterbody will necessarily be met, particularly, when there are multiple point and non-point sources of a given pollutant. This is a condensed explanation of the reasons why the Category 5 designation is warranted. At the option of the Port of Seattle, we are willing to have a more in depth discussion about the basis of this listing.
Port of Seattle	42352	The proposed listing of Des Moines Creek-East Tributary for copper is based on data that is at least 19 years old. In the 19 years since that data was collected the Port has invested over $80,000,000 in water quality and flow improvements for stormwater runoff at Sea-Tac International Airport. Much of this investment has specifically targeted the treatment and reduction of copper and other metals in stormwater discharges to Des Moines Creek… The Port's significant investment in infrastructure and management actions over the past decade to address copper levels in stormwater runoff in the Des Moines Creek-East Tributary basin combined with the determination of a site-specific water quality objective that is substantially higher than the generic acute criterion for this segment suggests that a Category 2 listing would be a more appropriate listing, rather a Category 5 listing based on 19 year-old data.	The water quality study required under the Port of Seattle NPDES permit and associated site specific water quality objective are not a surrogate for the evaluation of whether or not ambient water quality in Des Moines Creek- East Tributary meets state water quality standards. Site specific water quality objectives do not equate to site specific water quality criteria, which must undergo a formal rule making process to become effectual. We acknowledge and appreciate the pollution control practices that the Port has implemented in order to improve water quality. Meeting permit limits does not guarantee that water quality standards in a waterbody will necessarily be met, particularly, when there are multiple point and non-point sources of a given pollutant. It is not feasible for us to remove a Category 5 designation solely based on the age of the data with no more recent data showing that water quality standards are being met. In order to be removed from Category 5, the most recent data must show that the water quality criteria for copper are met, the basis for the Category 5 designation must be shown to be in error, or a TMDL must be completed (to move to Category 4A). We encourage the Port of Seattle to collect data that will show that water quality standards are now being met as a result of the substantial pollution control investments made by the Port.
Port of Seattle	42313, 71885, 73259	Listings 42313, 73759, 71885The water quality conditions in this short reach are dominated by the conditions in the pond since there are no other surface water inputs to this segment. It is well documented that shallow ponds, such as the Northwest Ponds, naturally have seasonal high temperature due to solar heating and high pH and low dissolved oxygen from natural physical and biological processes. These conditions have been observed in the Northwest Ponds and naturally influence water quality in this segment of Des Moines Creek. Considering the actions that have been taken to restore this section of the creek and its riparian zone and that the observed exceedances within this reach are due to the natural conditions within the Northwest Ponds a more appropriate assessment would be to list this reach as Category 1.	We believe the comment is addressing Listings 71885, 42313, 73259 on Des Moines Creek since Listing 73759 is for Tallant Creek (WRIA 49) and Listing 71855 is for Ammonia-N in Joes Creek (WRIA 10). We acknowledge that the Northwest Ponds may have a significant effect upon downstream water quality in the referenced reach of Des Moines Creek (assessment unit 17110019007359) and that best management practices recently installed are likely serving to protect water quality. Nevertheless, the available data shows that the applicable water quality criteria for DO, pH, and temperature are not being met in this assessment unit. At this time we do not believe there is sufficient data and information to show that human actions are not contributing to the observed excursions from the water quality criteria and therefore it is not feasible for us to place these listings into Category 1. We believe that further analysis would be required in order to conclusively demonstrate the relative contributions of natural and anthropogenic influences upon the observed water quality. One of the primary objectives of a TMDL study is to quantify the contributions of natural conditions and anthropogenic activities towards the observed water quality conditions. If a TMDL study finds that the observed conditions are solely attributable to natural sources, then no pollutant load allocations are assigned to human land uses.
Rogers-Cheryl	51553	I do not believe that this lake should be categorized as a 5 with one trout that was planted in the lake by WA Fisheries back in 2005. At that time it was category one. What has changed? This assessment needs to be seriously reviewed.	The sample data met requirements in Policy 1-11 (2012) for assessment purposes: Listing ID 51553 was based on results from a 5-fish composite sample of rainbow trout, not a sample from a single fish.
Rogers-Eric	51553	Listing ID: 51553 The Department of Ecology has not shown due diligence in the collection of its data, to make a correct Water Quality Assessment of Haven Lake. According to the data disclosed, Washington State Department of Ecology has based this Water Quality Assessment on "ONE" rainbow trout that was sampled and tested from our lake in 2005. A tissue sample	The sample data met requirements in Policy 1-11 for assessment purposes: Listing ID 51553 was based on results from a 5-fish composite sample of rainbow trout, not a sample from a single fish.

		of “ONE” trout planted in our lake by the WSDF, could not provide an accurate assessment of the water quality for any lake. Multiple samples from several species of fish (to rule out fish farm anomalies) should be required to asses any lakes condition. In fact, while reviewing the data DOE has provide, http://www.ecy.wa.gov/programs/wq/303d/freshwtrassessmnt/index.html, I have found inconsistencies with their reported data for 2005. Listing ID: 51553 > Location ID(s) [HAVEN-F] -- 1 of 1 composite sample(s) of rainbow trout (Oncorhynchus mykiss) Fillet, skin on tissue exceeded Washington's FTEC.	
Rogers-Eric	51665	Listing ID: 51665 In 2005, > Location ID(s) [HAVEN-F] -- 0 of 1 composite sample(s) of cutthroat trout (Oncorhynchus clarkii) Fillet, skin on tissue exceeded Washington's FTEC. > Location ID(s) [HAVEN-F] -- 0 of 1 composite sample(s) of largemouth bass (Micropterus salmoides) Fillet, skin on tissue exceeded Washington's FTEC. > Location ID(s) [HAVEN-F] -- 0 of 1 composite sample(s) of rainbow trout (Oncorhynchus mykiss) Fillet, skin on tissue exceeded Washington's FTEC.	Listing ID 51665 and 18 other Listing IDs for different chemicals were all based on results from 5-fish composite samples representing 3 different species. All samples met requirements of Policy 1-11 for assessment purposes.
RSBOJC	9608	The waterbody name is the Corral Creek Wasteway.	The name of the waterbody is Corral Creek in the NHD. No change has been made.
RSBOJC	50605	Please provide the data from 50606 listing ID if this merged file has a Category 5 assessment in the Corral Creek Wasteway.	The EIM station locations have been added to the listing. The study ID and location ID can be used to access the data in EIM that was used to develop the listing.
RSBOJC	45818	The current waterbody name is Joint Drain 2. If Ecology is following SVID nomenclature, this drain is more properly named JT DR 2. It is an SVID drain that crosses both counties, that's the reason for the word 'joint'. This drain is not a JD or joint drain shared between Roza and Sunnyside Valley Irrigation Districts.	The waterbody name has been changed to JT DR2.
RSBOJC	50620	The waterbody name should be Spring Creek Wasteway. This water is predominantly from the managed water spilled to the wasteways of the Sunnyside and Roza Canals.	We understand that RSBOJC prefers to refer to the feature as a wasteway. From a hydrological standpoint, the waterbody existed as a natural hydrologic feature prior to the advent of irrigation and the name of this feature in the NHD is Spring Creek. Therefore, no change has been made.
RSBOJC	16100	The proper name for this waterbody is the Snipes Creek Wasteway.	We understand that RSBOJC prefers to refer to the feature as a wasteway. From a hydrological standpoint, the waterbody existed as a natural hydrologic feature prior to the advent of irrigation and the name of this feature in the NHD is Snipes Creek. Therefore, no change has been made.
RSBOJC	16092	The proper name for Snipes Creek in this location is Snipes Creek Wasteway.	We understand that RSBOJC prefers to refer to the feature as a wasteway. From a hydrological standpoint, the waterbody existed as a natural hydrologic feature prior to the advent of irrigation and the name of this feature in the NHD is Snipes Creek. Therefore, no change has been made.
RSBOJC	15025	We agree with Category 2 for this waterbody. This waterbody is properly called the Snipes Creek Wasteway.	We understand that RSBOJC prefers to refer to the feature as a wasteway. From a hydrological standpoint, the waterbody existed as a natural hydrologic feature prior to the advent of irrigation and the name of this feature in the NHD is Snipes Creek. Therefore, no change has been made.
RSBOJC	10022	The data is from 2003. This waterbody is the Corral Creek Wasteway, used by the Roza Irrigation District and the Benton Irrigation District as a wasteway. The RSBOJC Water Quality laboratory has recent data showing the bacteria amount spilled from Roza WW7 to the Corral Creek Wasteway do not exceed state criteria. This data can be supplied.	Data that has been considered in this assessment is from the period of January 2001 through December 2010. Please submit the post-2010 data to Ecology and it will be used to update the listing in the subsequent assessment.
RSBOJC	47296	The "designated use" is none assigned. Irrigation districts have a specific use to convey irrigation water to landowners who have paid an assessment fee. This water is not available for public use. The Corral Creek Wasteway should be listed as such so as not to confuse this segment of water with any others with a similar name.	This waterbody is named "Corral Creek" in the federal Geographic Names Information System (GNIS). This is the system that Ecology uses to assign waterbody names to assessment units in the water quality assessment. A name change for the waterbody would need to go through the United States Geological Survey and the United States Board on Geographic Names. The designated use field in this and other listings has not been populated. There are two listings in the assessment for this NHD reach of Corral Creek; one is for pH and the other is for dissolved oxygen. According to the state water quality standards, aquatic life is one of the designated use of Corral Creek and therefore it is

			appropriate to evaluate the available dissolved oxygen and pH data relative to water quality standards for the protection of aquatic life in this waterbody.
RSBOJC	50607	This listing is in Benton county. The data provided is in Lewis county for G0200280. Please review. Is this the Corral Creek Wasteway?	We appreciate you bringing this to our attention, it appears that during the transfer to NHD the Study ID was improperly entered. The corrected Study IDs are G0000280 and G0200276.
RSBOJC	45299	Corral Creek Wasteway appears to have three sites that are sampled. It would be easier to view the data if there was a listing ID for each of the three sites, rather than combining the sites. One of the two sites listed does not exceed the standards. That segment of the waterbody should not be a Category 5. The site that exceeds the standards should be listed as the Category 5. Please note that this open area has beavers and muskrats that provide bacteria to the system.	Ecology assesses the data that are collected within the assessment unit, rather than by station. While we appreciate the help in identifying the sources, the data and recreational use criterion determine the listing.
SCBID		Assessment Unit 17020016000931 should be mapping the WB 5K. This canal flows southwest from Hollingsworth Rd. The portion of the currently mapped assessment unit that travels South is a separate canal.	The spatial delineation of the NHD reach is incorrect. The extent of the assessment unit has truncated to exclude the portion of the NHD reach that is not the WB 5K canal. We appreciate you bringing this to our attention.
SCBID	71542, 72444, 77866, 70598, 73324	Proposed listings 71542, 72444, 77866, 70598, and 73324 are on Priest Rapids Wasteway. This canal flows through a series of ponds to the North of the current line, not west as currently mapped.	The spatial delineation of the NHD reach is incorrect. The extent of the assessment unit has truncated (at the inlet of the first pond) to exclude the portion of the NHD reach that is incorrectly mapped as flowing west from the first pond into the Columbia River. We appreciate you bringing this to our attention.
SCBID	70590, 71536, 72445, 73316	Proposed listings 70590, 71536, 72445, and 73316 are on Saddle Mountain Wasteway and should be mapped on an assessment unit running south to Saddle Mountain Lake. The canal they are currently placed on is a tributary to Saddle Mountain Wasteway and not the canal from which samples were taken.	The EIM station SADDLEMTNWW is incorrectly georeferenced to NHD reach 17020016001474. The correct reach code is 17020016001082. This has been corrected in the noted listings. We appreciate you bringing this to our attention.
SCBID	16071, 15156, 16084	Further, listings associated with USBR site 096 should be placed on this same assessment unit to Saddle Mountain Lake. These are proposed listings 16071, 15156, and 16084 which are incorrectly mapped on a portion of canal to the North.	The assessment unit for station USBR has been changed to 17020016001082 and the data for station SADDLEMTNWW that was in listings 70590, 73316, and 77341 has been rolled into listings 16071, 15156, and 16084 since it was also collected on this assessment unit; these actions made listings 70590, 73316, and 77341 redundant and therefore they have been inactivated. We appreciate you bringing this to our attention.
SCBID	70591, 70592, 72435, 77863	Proposed listings 70591, 70592, 72435, and 77863 are mistakenly mapped to the Northeast in the Wahatis Wasteway and not in Saddle Mountain Wasteway.	Listings 70591, 72435, and 77863 have been inactivated because they were based solely on data collected by the Bureau of Reclamation, who has indicated in a public comment on the draft assessment that the data they collected has not undergone the appropriate quality assurance reviews. The description for station 12472940 in listing 70592 is "SCBID WAHATIS WASTEWAY NEAR MATTAWA, WA". The georeferencing of this listing has not been revised because no discrepancy between the station description, the NHD reach, and the listing information has been identified in our review.
SCBID	Multiple	Correctly mapping these sites will result in duplicate listings. Proposed listing 16071 should be combined with proposed listing 73316. Proposed listing 15156 should be combined with proposed listing 77863. Proposed listing 16084 should be combined with proposed listings 70590 and 70591. Proposed listing 72435 should be combined with proposed listing 72445.	Listing 73316 has been rolled into listing 16071. Listing 77863 has been rolled into listing 15156. Listing 70590 has been rolled into listing 16084. Listings 70591 and 72445 have been inactivated because they were based solely on data collected by the Bureau of Reclamation, which has indicated in a public comment on the draft assessment that the data they collected has not undergone the appropriate quality assurance reviews.
SCBID	8292, 8293, 8991	Proposed listings 8293, 8292, and 8991 which should be in the Ezquatzel Coulee have been incorrectly placed on another canal. The Esquatzel Coulee runs North/South crossing Sheffield road and parallels the Burlington Northern railroad line. The assessment unit for these listings should run South from Sheffield road.	We appreciate you bringing this to our attention. The data from listings 8293, 16065, and 16090 has been rolled into listings 8290, 8291, and 8992, respectively, and the former listings have been inactivated in order to assign the data to the correct the assessment units and delete duplicate listings. The correct Assessment Unit for the latter listings is 17020016001985 (Esquatzel Coulee reach at Mesa).
SCBID	Multiple	Changing the way this is mapped results in 3 duplicate listings. Proposed listing 8291 should be combined with 16065. Proposed listing 8292 should be combined with proposed listing 16090. Proposed listing 8293 should be combined with proposed listing 8290.	We appreciate you bringing this to our attention. The data from listings 8293, 16065, and 16090 has been rolled into listings 8290, 8291, and 8992, respectively, and the former listings have been inactivated in order to assign the data to the correct the assessment units and delete duplicate listings. The correct Assessment Unit for the latter listings is 17020016001985 (Esquatzel Coulee reach at Mesa).

SCBID	Multiple	Proposed listings 15157, 15169, 16069, 45408, 47919, 51187, 71544, and 73309 all use data from the same location, but are mapped at separate locations. The correct assessment unit is the one associated with listing 45408. Correcting this mapping error will result in duplicate listings. Proposed listing 15157 should be combined with proposed listing 47919. Proposed listing 15169 should be combined with proposed listing 51187. Proposed listing 16069 should be combined with 73309.	We appreciate you bringing this to our attention. The data from each of the stations belongs to NHD reach code 17020016003644. Listings were combined in order to eliminate duplication and the listings associated with assessment unit ID 17020016000364 were removed from the assessment.
SCBID	Multiple	Assessment Units 17020016005576, 17020016007400, 17020016005490 should be mapped as one unit. These units are on the Potholes East Canal and no other canals enter this waterbody in this section of the canal. Rectifying this will result in several duplicate listings. Proposed listing 77695 should be combined with proposed listing 77871. Proposed listing 16064 should be combined with proposed listing 73334. Proposed listing 16080 should be combined with proposed listings 70607 and 70610.	The listings associated with assessment unit 17020016005576 have been inactivated because the USBOR data serving as the basis of the listings does not meet quality assurance requirements. Listings associated with Assessment Unit 17020016005490 and Assessment Unit 17020016007400 have been combined because their data is from the same location; the correct reach code for these combined listings (16064, 16080, 15170) is 17020016007400
SCBID	Multiple	Assessment units 17020016003970, 17020016007398 should be mapped as one unit. These units are in the EL 68D Wasteway and are only separated by Washington Highway 17. Changing this assessment unit will result in numerous duplicate listings. Proposed listing 40823 should be combined with proposed listing 70609. Proposed listing 70824 should be combined with proposed listing 73333. Proposed listing 40822 should be combined with proposed listing 77872. Proposed listing 74390 should be combined with proposed listing 74411.	We understand the practical consideration behind the comment. Our current convention is to assign one assessment unit per NHD reach code, even if the NHD reaches are adjacent and short in length. We may combine the two assessment units in the future, but at this time we are keeping the listings separate.
SCBID	Multiple	Proposed listings 16073, 16077, 70603, and 77869 should all be placed on the WB 5 canal. Currently proposed listings 16073, 16077, 70603, and 77869 are mapped on the Wahluke Branch Canal. Instead, these should be placed on Assessment Unit 17020016000927. Making this correction will result in duplicate listings. Proposed listing 16073 should be combined with proposed listing 73311. Proposed listing 16077 should be combined with proposed listings 70603 and 70586.	We appreciate you bringing this to our attention. Listings 70603 and 77869 have been removed from the assessment because they were based on Bureau of Reclamation data that does not meet quality assurance requirements. The identified listings had been incorrectly georeferenced and have been combined with the listings associated with assessment unit ID 17020016000927.
SCBID	73320	Also proposed Listing 73320 for temperature should be removed from Category 5 as there are only 2 excursions using the data from the original proposed listing.	Per WAC 173-201A-600, this waterbody segment is designated as Core Summer Salmonid Habitat because it is a tributary to waters with this designated use. Therefore, the 16 degree C. temperature criterion is applicable and no change to the listing is warranted at this time.
SCBID		Through talking with USBR staff it is our understanding that data entered into STORET is raw data and has not undergone a QA/QC check to validate results. Therefore this data should not meet the Department of Ecology's Program Policy 1-11, Chapter 2, Ensuring Credible Data for Water Quality Management. This data should be removed from listings within SCBID and those listing reassessed using only data that meets Policy 1-11.	US Bureau of Reclamation has informed Ecology that the STORET Project data have not been through appropriate QA\QC in accordance with credible data requirements and should not be used for assessment. Ecology has removed these data from the assessments.
SCBID	77688	Assessment Unit ID 17020016001833 has been assessed against an incorrect standard. Our canals fall into the default beneficial uses according to the current Surface Water Quality Standards and so this assessment unit should have been compared against a temperature of 17.5°C and a Dissolved Oxygen level of 8 mg/L. Because of this, proposed listing ID 77688 for Dissolved Oxygen should be removed.	Per WAC 173-201A-600, this waterbody segment is a tributary to waters designated as core summer salmonid habitat and therefore is also designated as core summer salmonid habitat, so the 16 degrees C. temp criterion and 9.5 mg/L DO are applicable.
SCBID	Multiple	Assessment Units 17020016005576, 17020016007400, 17020016005490 should be mapped as one unit. These units are on the Potholes East Canal and no other canals enter this waterbody in this section of the canal. This will produce duplicate listings which will need to be combined.	*These assessment units (AUs) are derived from separate NHD features that have been assigned individual reach codes. At this point, we do not intend to combine the three identified AUs into a single AU. Our current convention is to have a 1:1 relationship between NHD reaches and assessment units for most surface water channels; to combine the three AUs into a single AU would create a 3:1 relationship. We recognize that there may be deficiencies in the NHD, particularly with regards to irrigation canals and ditches. There may be good reasons for revising the NHD reach designation for the identified area, since as pointed out, there are changes to the reach codes/AUs despite a lack of junctions with other canals. We are open to working with the SCBID to review and potentially revise the NHD as appropriate during the next assessment cycle to ensure that water bodies in the district are accurately mapped.*
SCL	19848	The exceedances noted for listing 19848 are infrequent, old, and indicate only one 7DADmax of 14.5°C. Our thermistor data in one of the study reaches that was installed in 2011 does not indicate any exceedances, and temperatures have never exceeded 12°C. Slate Creek is one of coldest tributaries, and we question the accuracy and relevance of the data identified in the listing.	Data was reviewed for quality assurance. Study ID G0200179 was assessed at Level 4 (Data verified and assessed for usability in a Formal Study Report) which is acceptable for use in the Assessment. Listing remains in Category 2 based on assessment in accordance with Policy 1-11. The data falls within the years that were assessed for this listing cycle (2001-2010).

SCL	73117	Our thermistor data indicates that temperatures have, for very short periods of time, exceeded the 7-day mean of daily maximum values of 12°C, but not to the extent that the older data indicate. As stated above, we expect this to continue to improve as restoration projects are implemented.	Comment noted. The temperature impairment in this Assessment Unit is being addressed by the Colville National Forest Temperature TMDL
SCL	19858	We currently have two thermistors in this listing area, one at the upstream end near the South Fork of Sullivan Creek and one at the downstream end near the town of Metaline Falls. We will have accurate data for this listing area in the next review process.	Comment noted. This listing is part of the Colville National Forest Fecal coliform Bacteria and Temperature TMDL, approved by EPA on 08/05/2005.
SeaTac	42309	The current Category 5 listed should be changed based on July 2012 Ecology Study of Zinc and Copper in Des Moines Creek. Per the study, the two exceedances listed in 2010 were during the same storm event and are counted as one (averaged together) exceedance for the purposes of the report. The report specifically recommends removing both copper and Zinc from the 303d listing.	Ecology reviewed this report, which recommends that the Water Quality Policy should evaluate the data and consider removing the Category 5 listings for copper in 3 creeks. These data were assessed and the data supports this listing as it is. The report shows that there were 2 exceedances of Water Quality Policy criteria in Des Moines Cr for copper. The acute criterion was exceeded on 10/24/10 at DES03-1 and DES03-2 (the DES03-2 result was a mean from a replicate pair). The chronic criterion was exceeded on 12/11/10 at DES03-1 and DES03-2. Table C-3 in the study report identifies these exceedances using bold font or underlining. Interestingly, the report (p 34) states that the chronic criteria do not apply because the chronic criteria are meant to represent a 4-day average and the samples were collected over a period of only a 5-hr and 2-hr period. However, for Assessment purposes, Ecology's Water Quality Policy deemed that a single grab sample is adequate to represent the time period of 4 days for the chronic criterion (Water Quality Policy 1-11, Section 6 - Assessment Methodology).
Seattle	12157	Listing 12157 relies solely on Swimming Beach data. If Ecology has determined that listings that rely solely on Swimming Beach data should be Category 3, then this listing should be Category 3. This is consistent with the category changes for other beach segments (e.g. 12205).	Upon review, we agree. The Listing has been placed in Category 3 because it relies solely on swimming beach data.
Seattle		For sediment listings on Duwamish Waterway: The basis for the proposed listing states that: "This grid is in an area of the LDW designated as a Superfund Site. This area is awaiting ROD approval, therefore it is assessed as Category 5." This statement is out-of-date. As of November 2014, an EPA Record of Decision (ROD) is in place for the Lower Duwamish Waterway (LDW) CERCLA site. This suggests that the listing should be Category 4B for the LDW. Recommend that all the other segments of the LDW be corrected for this issue. Listing IDs: 607351, 605242, 607316, 507652, 507660, 607351, 608158, 622723, 611904, 623743, 508305, 614728, 24091, 605433, 62488, 620983, 603503, 624887, 610786, 605677, 615720, 611290, 618387, 625343-625371, 625373, 625372, 625401, 625374-625400, 625401, 625341, 625339, 625342, 625340.	Comment noted; the issue will be addressed during the next marine waters assessment.
Seattle	507457	The basis for the proposed listing 507047 states that: "The grid is in an area with a legally enforceable cleanup plan, therefore it is assessed as Category 4B. Statute: CERCLA has a ROD in an area commonly known as Harbor Island East WW. Source tracing underway. Cleanup expected in 2015." It is accurate that source tracing is underway, but statements about the ROD and cleanup are not accurate. The East Waterway Operable Unit of the Harbor Island CERCLA site is in the RI/FS phase of the CERCLA process, and a ROD is at least a year or two away. Recommend no change in category: 4B. [Note: this comment also applies to these other listing ID's in East Waterway: 507050 through 507094 and 623999.]	Comment noted; the issue will be addressed during the next marine waters assessment.
Seattle	50723	ROD for the West Waterway Operable Unit for the Harbor Island CERCLA Site has been in place since September 11, 2003. This suggests that the sediment listings in this area should be 4B (not 5).	Comment noted; the issue will be addressed during the next marine waters assessment.
Seattle	507037	ROD for the West Waterway Operable Unit for the Harbor Island CERCLA Site has been in place since September 11, 2003. This suggests that the sediment listings in this area should be 4B (not 5).	Comment noted; the issue will be addressed during the next marine waters assessment.
Seattle	12157	Listing 12157 relies solely on Swimming Beach data. If Ecology has determined that listings that rely solely on Swimming Beach data should be Category 3, then this listing should be Category 3. This is consistent with the category changes for other beach segments (e.g. 12205).	This listing was changed to Category 3 because it relies solely on swimming beach data.
Seattle	17383	For listings 17383, 17381, 78519, 17378 proposed to be Category 5: The water quality Policy 1-11 listing criteria for Toxics Category 2 Determination states "Tissue data: A segment will be placed in Category 2 when any one single-resident fish sample exceeds the human health criteria and the segment is not otherwise listed in Category 5 for the pollutant." These listings are based on a single resident fish sample	This listing was determined in the previous Integrated Report/303(d) list and approved by EPA. The samples were composite measures: this listing is based upon a 7 fish COMPOSITE sample. Associated data are also in the EIM database.

		and PCB; 4,4'-DDE; 3,7,8,TCDD; and Chlordane are not otherwise listed in Category 5 for Green Lake. These listings should be Category 2.	
Seattle	17381	For listings 17383, 17381, 78519, 17378 proposed to be Category 5: The Water Quality Policy 1-11 listing criteria for Toxics Category 2 Determination states "Tissue data: A segment will be placed in Category 2 when any one single-resident fish sample exceeds the human health criteria and the segment is not otherwise listed in Category 5 for the pollutant." These listings are based on a single resident fish sample and PCB; 4,4'-DDE; ,3,7,8,TCDD; and Chlordane are not otherwise listed in Category 5 for Green Lake. These listings should be Category 2.	This listing was determined in the previous Integrated Report/303(d) list and approved by EPA. The samples were composite measures: this listing is based upon a 7 fish COMPOSITE sample. Associated data are also in the EIM database.
Seattle	78519	For listings 17383, 17381, 78519, 17378 proposed to be Category 5: The Water Quality Policy 1-11 listing criteria for Toxics Category 2 Determination states "Tissue data: A segment will be placed in Category 2 when any one single-resident fish sample exceeds the human health criteria and the segment is not otherwise listed in Category 5 for the pollutant." These listings are based on a single resident fish sample and PCB; 4,4'-DDE; ,3,7,8,TCDD; and Chlordane are not otherwise listed in Category 5 for Green Lake. These listings should be Category 2.	This listing was determined in the previous Integrated Report/303(d) list and approved by EPA. The samples were composite measures: this listing is based upon a 7 fish COMPOSITE sample. Associated data are also in the EIM database.
Seattle	17378	For listings 17383, 17381, 78519, 17378 proposed to be Category 5: The Water Quality Policy 1-11 listing criteria for Toxics Category 2 Determination states "Tissue data: A segment will be placed in Category 2 when any one single-resident fish sample exceeds the human health criteria and the segment is not otherwise listed in Category 5 for the pollutant." These listings are based on a single resident fish sample and PCB; 4,4'-DDE; ,3,7,8,TCDD; and Chlordane are not otherwise listed in Category 5 for Green Lake. These listings should be Category 2.	This listing was determined in the previous Integrated Report/303(d) list and approved by EPA. The samples were composite measures: this listing is based upon a 7 fish COMPOSITE sample. Associated data are also in the EIM database.
Seattle	15808	For listing 15808 proposed for Category 5: Recent data shows the water quality standards are being met - 0% exceedances in 2004, 2005, 2006 and 2009. Original listing was based on data from 1991. Recommend that his should be Category 1.	Marine Waters: these data were not reassessed using the Policy 1-11 (2012) during this assessment cycle. However, the data are for enterococcus and are not used in assessing waters for a Category 1 determination if there is a primary contact recreation use designation. This Assessment Unit has that primary contact use designation and the monitoring is associated with Lowman Beach Park.
Smith	70148	Proposed listing The mapped water body is a segment of Rolling Hills Creek and a segment of Thunder Hills Creek. These are not tributary to Cedar River. They are tributary to Springbrook Creek/Black River and Duwamish River. Is this a mapping error?	The waterbody name in the listing has been renamed as Rolling Hills Creek and the watershed has been changed to the Duwamish River watershed.
Snohomish County	3756	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 25 year old data.	The listing and the study serving as the basis for the listing has been reviewed. The listing was assigned to category for the 1996 303(d) list based on the Thornburgh data. The data met quality assurance requirements at time. The listing meets the current Category 5 decision rules for bacteria outlined in Policy 1-11; multiple samples were collected across multiple years and more 10% of the samples exceeded 200cfu/100mL. A Category 5 listing carries forward to the next assessment unless it is shown that the original basis was in error, there is data showing that the applicable water quality criteria are met, the assessment methodology or applicable criteria have changed, and/or a water quality restoration plan has been developed e.g. a TMDL). This listing does not qualify for a Category 5 "de-listing" based on these guidelines. An absence of more recent data from a waterbody does not mean that a waterbody is not impaired nor that the original impairment decision was incorrect. Therefore, it would be inappropriate to de-list the assessment unit simply because there isn't more recent data. Ecology encourages Snohomish County to collect additional bacteria data in this assessment unit in order to incorporate the data into the next water quality assessment, particularly if the County believes that there is no longer impairment to its recreational use.
Snohomish County	7238	Review listing and place in more appropriate Category such as 2 or 3. ECY's Remark indicates that the referenced {CHURCH CREEK) data for DO is not in the administrative record. The segment listed as Category 5 is based on the 1998 assessment.	This record has been deactivated because there is not an administrative record of the cited data.

Snohomish County	7273	Remove Thornburgh et. al. data and Change to Category 1. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken in situ. No other data from ECY studies showed excursions.	Ecology has removed this data based on quality control issues and has reassessed the basis for this listing. Listing has been placed in Category 3 because there was not continuous data to place in Category 1.
Snohomish County	7276	Remove Thornburgh et. al. data and Change to Category 1. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken in situ. No other data from ECY studies showed excursions.	Ecology has removed this data based on quality control issues and has reassessed the basis for this listing. Ecology data showed excursions in 1995, 1996, and 1997. Since there is no newer data, data older than ten years is considered the most recent. Listing will continue to be shown in Category 5 because at least 10 percent of samples were excursion of the criteria in at least one year and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	7282	Remove Thornburgh et. al. data and Change to Category 1. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken in situ. No other data from ECY studies showed excursions.	Ecology has removed this data based on quality control issues and has reassessed the basis for this listing. Listing will continue to be shown in Category 5 because at least 10 percent of samples were excursion of the criteria in at least one year and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	7291	Remove Thornburgh et. al. data and Change to Category 1, 2 or 3. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken in situ. No other data from ECY studies showed excursions. Analysis of 128 measurements showed only 6 excursions which represents only a 1% probability of true impairment.	Ecology has removed this data based on quality control issues and has reassessed the basis for this listing. Listing will continue to be shown in Category 5 because at least 10 percent of samples were excursion of the criteria in at least one year and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	7294	Remove Thornburgh et. al. data and Change to Category 1. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken in situ. No other data from ECY studies showed excursions.	Ecology has removed this data based on quality control issues and has reassessed the basis for this listing. Listing has been placed in Category 3 because there was not continuous data to place in Category 1.
Snohomish County	7299	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 14 year old data. Quality assurance and control procedures not known or verified.	Data was reviewed for quality assurance. Study ID G9900233 was assessed at Level 4 (Data verified and assessed for usability in a Formal Study Report) which is acceptable for use in the Assessment. Listing remains in Category 5 based on assessment in accordance with Policy 1-11. The data falls within the years that were assessed for this listing cycle (2001-2010).
Snohomish County	7312	Change to Category 1 or 2. Probability of true impairment very low. Analysis of data shows a 4% probability of impairment based on 118 measurements with 7 excursions	This listing remains in Category 5 based on data from years 2006, 2007, and 2009. According to Policy 1-11, a segment will be placed in Category 5 for temperature using single sample data when a minimum of three excursions exist from all data considered, and at least ten percent of single grab sample values in a given year exceed the criterion.
Snohomish County	7400	Change to Category 1 or 2. Probability of true impairment very low. The data relied on shows approximately 140 DO measurements and 7 excursions. Analysis of data shows a 1% probability that greater than 10% of samples exceed the criteria.	The Category 5 designation is based on data from 2006, 2007 and 2009. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	7435	Review listing and place in more appropriate Category such as 2 or 3. Listing based on pre-1999 data. Additionally, ECY needs to disclose % of excursions WDFW found per year at inflow to Hatchery. Can't make determination of impairment with the data provided.	Listing has been moved to Category 3. The original listing in the 1998 water quality assessment was based on a narrative description submitted by WDFW that water temperatures at the Skykomish Hatchery intake exceeded 18 degrees Celsius by 5 degrees C., during 10 days per year and/or for 5 consecutive days. No data was submitted by WDFW. Since the original data cannot be assessed according to the current temperature decision rules outlined in Policy 1-11, the WDFW data cannot serves as a basis for a continued Category 5 designation.
Snohomish County	7450	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 20 year old data.	The data was collected under a quality assurance project plan (Ambient Water Quality Monitoring Program Quality Assurance Project Plan) developed by Snohomish County. The data meets the current listing policy for Category 5 (e.g. more than two samples exceeded the percent criterion and more than 10% of all values exceeded the criterion). A Category 5 listing carries forward to the next assessment unless it is shown that the original basis was in error, there is new data showing that the applicable water quality criteria are met, the assessment methodology or applicable criteria have changed, and/or a water quality restoration plan has been developed e.g. a TMDL). This listing does not qualify for a Category 5 "de-listing" based on these guidelines. An absence of more recent data from a waterbody does not mean that a waterbody is not impaired nor that the original impairment decision was incorrect. Therefore, it would be inappropriate to de-list the assessment unit

			simply because there isn't more recent data. Ecology encourages Snohomish County to collect additional bacteria data in this assessment unit in order to incorporate the data into the next water quality assessment, particularly if the County believes that there is no longer impairment to its recreational use.
Snohomish County	7463	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 224 measurements and 21 excursions represents only a 34% probability of true impairment. 2009 had 99% probability of impairment, but it was an extremely hot year which likely resulted in more excursions during spring and summer.	The Category 5 designation is based on data from 2004, 2005, 2008, and 2009. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	7466	Change to Category 1 or 2. Probability of true impairment very low. All data considered= 158 measurements and 8 excursions represents only a 0.84% probability of true impairment.	This listing remains in Category 5 based on data from years 2006, 2007, and 2009. According to Policy 1-11, a segment will be placed in Category 5 for temperature using single sample data when a minimum of three excursions exist from all data considered, and at least ten percent of single grab sample values in a given year exceed the criterion.
Snohomish County	8638	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 25 year old data.	The listing has been moved from Category 5 to Category 3. The available data is credible, but a reassessment has found that the data does not meet the Category 5 decision criteria described in the current Policy 1-11. The study does not show three exceedances and 10% of values that were 5 NTU over the background condition.
Snohomish County	8639	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 25 year old data.	The listing has been moved from Category 5 to Category 3. The available data is credible, but a reassessment has found that the data does not meet the Category 5 decision criteria described in the current Policy 1-11. The study does not show three exceedances and 10% of values that were 5 NTU over the background condition.
Snohomish County	9273	Disclose % of excursions found by year. Can't determine annual or overall conformance to Water Quality Policy 1-11, but likely high probability of impairment.	The Category 5 listing was originally based on the 1995 Snohomish County data. Listings that originated in a prior assessment cycle and are based on data that was collected before the current data window are not reassessed carte blanche in a subsequent assessment cycle. We can however check to see if the application of the current listing policy would change the category determination. The 1995 data meets the current Policy 1-11 decision rule for a Category 5 determination, especially since the applicable water quality criterion changed from 18 to 16 degrees Celsius since the original basis was developed. It is not possible for a temperature listing to be removed from Category 5 based on analysis of temperature grab samples; continuous temperature monitoring data would be needed to move out of Category 5. Therefore the % of excursions since 1995 are inconsequential to the proposed listing category and are not provided in the listing record at this point.
Snohomish County	9296	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 114 measurements and 3 excursions represents only a 0.05% probability of true impairment. 2009 only year in eight which had > 10% of samples exceed criterion - representing only a 38% probability of impairment.	The Category 5 designation is based on data from 2004, 2005, and 2009. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	10621	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 141 measurements and 6 excursions represents only a 0.37% probability of true impairment. 2009- 3 of 12 samples exceeded criterion worst year of 14. Represents 88% probability of impairment for only that year.	The Category 5 designation is based on data from 2005, 2007 and 2009. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	12681	Change to Category 1 or 2. Probability of true impairment very low. Listing based upon 17 year old data. King County data does not disclose the % of samples in each year that exceeded the criterion. Excluding King County data, 63 total measurements and 4 excursions represents only a 13% probability of true impairment. 2005-2008 (last years of data available) all met criteria. 2004 most recent year to exceed criterion.	The Category 5 designation is based on data from 2004, 2006 and 2007. King County data was not considered for this Assessment. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	13122	Remove listing. Listing basis indicates that E. Coli data can be used to infer exceedance of the fecal coliform standard. This is an improper change of standards through policy and/or the improper use of a proxy	E. coli is a subset of Fecal coliform bacteria, therefore E. Coli levels above the Fecal coliform standard can be used to infer an exceedance of this water quality standard.
Snohomish County	14726	Change to Category 1 or 2. Probability of true impairment very low. All data considered= 137 measurements and 5 excursions represents only a 0.15% probability of true impairment. 2004 had most excursions 3 of 11 representing a 91% probability of impairment for that year only.	The Category 5 designation is based on data from 2004, 2006 and 2009. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.

Snohomish County	17494	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and CREEK control procedures not known or verified in Friends of Blackmans Lake Volunteer data.	The data was collected in accordance with a quality assurance project plan (the Swift Creek Watershed Monitoring Project) that is on file at the Dept. of Ecology. No changes to the listing are warranted.
Snohomish County	17495	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and CREEK control procedures not known or verified in Friends of Blackmans Lake Volunteer data.	The data was collected in accordance with a quality assurance project plan (the Swift Creek Watershed Monitoring Project) that is on file at the Dept. of Ecology. No changes to the listing are warranted.
Snohomish County	35163	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.	A category change is not warranted. The referenced data is on file at the Dept. of Ecology and met Ecology's quality assurance requirements at the time it was originally incorporated into the water quality assessment. Entities submitting data prior to the 2006 water quality assessment cycle were not required to submit formal quality assurance documentation and Policy 1-11 states that such documentation is not required for pre-2006 data.
Snohomish County	35166	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.	A category change is not warranted. The referenced data is on file at the Dept. of Ecology and met Ecology's quality assurance requirements at the time it was originally incorporated into the water quality assessment. Entities submitting data prior to the 2006 water quality assessment cycle were not required to submit formal quality assurance documentation and Policy 1-11 states that such documentation is not required for pre-2006 data.
Snohomish County	35167	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.	A category change is not warranted. The referenced data is on file at the Dept. of Ecology and met Ecology's quality assurance requirements at the time it was originally incorporated into the water quality assessment. Entities submitting data prior to the 2006 water quality assessment cycle were not required to submit formal quality assurance documentation and Policy 1-11 states that such documentation is not required for pre-2006 data.
Snohomish County	35168	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data	A category change is not warranted. The referenced data is on file at the Dept. of Ecology and met Ecology's quality assurance requirements at the time it was originally incorporated into the water quality assessment. Entities submitting data prior to the 2006 water quality assessment cycle were not required to submit formal quality assurance documentation and Policy 1-11 states that such documentation is not required for pre-2006 data.
Snohomish County	35297	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.	A category change is not warranted. The referenced data is on file at the Dept. of Ecology and met Ecology's quality assurance requirements at the time it was originally incorporated into the water quality assessment. Entities submitting data prior to the 2006 water quality assessment cycle were not required to submit formal quality assurance documentation and Policy 1-11 states that such documentation is not required for pre-2006 data.
Snohomish County	40743	Change to Category 1 or 2. Probability of true impairment very low. Listing basis for use of 1998-2002 Snohomish County data does not disclose the% of samples in each year that exceeded the criterion. Excluding 1998 - 2002, 51 total measurements and 5 excursions represents a 41% probability of true impairment.	The Category 5 designation is based on the most recent data from 2007, 2008, 2009 and 2010. Snohomish County data was not considered for this Assessment because of more recent data. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	40748	Change to Category 1 or 2. Probability of true impairment very low. Listing basis for use of 1998-2002 Snohomish County data does not disclose the% of samples in each year that exceeded the criterion. Excluding 1998- 2002, only 4 of 51 results exceeded criteria resulting in 23% probability of impairment. Basis appears to have errantly included sample results for French Creek Lower (FCLD) in the same segment as for French Creek Upper (FCLU) and contributes to listing as Cat 5. Revisit NHD reach and location of FCLD.	Ecology has reviewed the basis for this listing and continues to find the listing appropriately placed on Category 5 because from 2006 to 2010, at least 10 percent of samples were excursion of the criteria in at least one year and at least 3 excursions exist from all data considered, in accordance with Policy 1-11. The data from station FLCD has been removed from the listing, but does not affect the category outcome.
Snohomish County	40785	Change to Category 1 or 2. Probability of true impairment very low. Listing basis for use of 2001 Snohomish County data does not disclose the % of samples that exceeded the criterion. Excluding this year, 80 total measurements and 7 excursions represents a 34% probability of true impairment. 2008 and 2009 only known years with > 10% of measurements exceeding criteria with 2 of 12 exceeding or 65% probability of impairment.	The Category 5 designation is based on the most recent data from 2005, 2006, 2007, 2008, and 2009. Snohomish County data was not considered for this Assessment because of more recent data. Ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11.
Snohomish County	40791	Change to Category 1 or 2. Probability of true impairment very low. All data considered= 81 measurements and 3 excursions represents only a 1% probability of true impairment. 2004- 2 of 11 samples exceeded criterion- worst year of 8. Represents 69% probability of impairment for only that year.	The Category 5 designation is based on data from 2004 and 2010. An assessment unit is assigned a Category 5 designation for pH when at least three values in the dataset being

			considered do not meet the pH criteria and at least 10% of the values in a given year do not meet the criteria.
Snohomish County	40805	Change to Category 1 or 2. Probability of true impairment very low. All data considered= 86 measurements and 3 excursions represents only a 0.68% probability of true impairment.	The Category 5 designation is based on data from 2001, 2004, and 2005. An assessment unit is assigned a Category 5 designation for pH when at least three values in the dataset being considered do not meet the pH criteria and at least 10% of the values in a given year do not meet the criteria.
Snohomish County	40817	Change to Category 1 or 2. Probability of true impairment very low. All data considered= 117 measurements and 10 excursions represents only a 25% probability of true impairment. Half of the results used for determination are > 13 years old.	The Category 5 designation is based on data from 2004, 2005, 2006, and 2009. An assessment unit is assigned a Category 5 designation for pH when at least three values in the dataset being considered do not meet the pH criteria and at least 10% of the values in a given year do not meet the criteria.
Snohomish County	40878	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 1886 measurements and 93 excursions represents a 0% probability of true impairment.	This listing remains in Category 5 based on data from years 2006, 2007, 2009, and 2010. According to Policy 1-11, a segment will be placed in Category 5 for temperature if at last one 7-day average daily maximum value from seven consecutive daily sampling events exceeds the criterion.
Snohomish County	40901	Change to Category 1 or 2. Probability of true impairment very low. All data considered= approximately 172 measurements and 3 excursions (all in 2006- suspect data?) represents only a 0.0002% probability of true impairment.	The EIM station leading to the Category 5 designation had been inadvertently omitted from the listing- Station "05TCHURH". The 2006 data for this station is summarized under the entry in the basis statement: "Location ID [Data from multiple locations]". A review of the 2006 data for this station shows that it was collected using a hydrolab and that multiple measurements exceeded the applicable criteria. The Category 5 designation is in alignment with Policy 1-11 and a change is not warranted.
Snohomish County	40930	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 134 measurements and 5 excursions represents only a 0.19% probability of true impairment.	The Category 5 designation is based on data from 2005, 2007, and 2009. An assessment unit is assigned a Category 5 designation for pH when at least three values in the dataset being considered do not meet the pH criteria and at least 10% of the values in a given year do not meet the criteria.
Snohomish County	47423	Review listing and place in more appropriate Category such as 1, 2, or 3. Probability of true impairment very low. Last data used to support listing collected in 2002- now 13 years old	Reviewed listing and determined that it remains in Category 5 based on assessment in accordance with Policy 1-11. The Category 5 designation is based on the most recent data from 2001 and 2002. The data falls within the years that were assessed for this listing cycle (2001-2010).
Snohomish County	47439	Review listing and place in more appropriate Category such as 1, 2, or 3. Probability of true impairment very low. Listing based upon 13 year old data.	Reviewed listing and determined that it remains in Category 5 based on assessment in accordance with Policy 1-11. The Category 5 designation is based on the most recent data from 2001 and 2002. The data falls within the years that were assessed for this listing cycle (2001-2010).
Snohomish County	47441	Review listing and place in more appropriate Category such as 1, 2, or 3. Probability of true impairment very low. Listing based upon 13 year old data.	Reviewed listing and determined that it remains in Category 5 based on assessment in accordance with Policy 1-11. The Category 5 designation is based on the most recent data from 2001 and 2002. The data falls within the years that were assessed for this listing cycle (2001-2010).
Snohomish County	47492	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Snohomish County Planning and Development Services study under ECY grant. Listing based upon 13 year old data.	Data was reviewed for quality assurance. Study ID G9900233 was assessed at Level 4 (Data verified and assessed for usability in a Formal Study Report) which is acceptable for use in the Assessment. Listing remains in Category 5 based on ten percent or more of the samples collected in a single year were excursions of the criterion, and at least 3 excursions exist from all data considered, in accordance with Policy 1-11. The assessed data falls within the years that were assessed for this listing cycle (2001-2010).
Snohomish County	47969	Change to Category 1 or 2. Probability of true impairment very low. Only 53% chance of true impairment	A review of the available data indicates that the original Category 5 listing was in error. There are only two samples in the dataset that did not meet the applicable criterion. The listing has been changed to Category 2.
Snohomish County	50735	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 13 year old data.	Listing remains in Category 5 based on assessment in accordance with Policy 1-11. The data falls within the years that were assessed for this listing cycle (2001-2010).
Snohomish County	71228	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 36 measurements and 3 excursions represents only a 33% probability of true impairment.	The Category 5 designation is based on data from 2005 and 2008. An assessment unit is assigned a Category 5 designation for pH when at least three values in the dataset being

			considered do not meet the pH criteria and at least 10% of the values in a given year do not meet the criteria.
Snohomish County	71237	Change to Category 1 or 2. Probability of true impairment very low. All data considered= 52 measurements and 3 excursions represents only a 9% probability of true impairment. Only one year (2006) of 5 had > 10% of measurements exceeding criteria.	The Category 5 designation is based on data from 2006 and 2008. An assessment unit is assigned a Category 5 designation for pH when at least three values in the dataset being considered do not meet the pH criteria and at least 10% of the values in a given year do not meet the criteria.
Snohomish County	72252	Change Remark. Remark incorrectly refers to use of 2007 exceedance of geometric mean and % criterion when only 1 sample was available - Water Quality Policy requires> 2 samples.	This remark was updated to correct the year that the geometric mean and percent criterion was exceeded.
Snohomish County	72516	Change to Category 3. Insufficient sample numbers to make a determination. Only one 7DadMax in 2005 used to support listing.	This listing remains in Category 5 based on data from years 2005. According to Policy 1-11, a segment will be placed in Category 5 for temperature if at last one 7-day average daily maximum value from seven consecutive daily sampling events exceeds the criterion. Data for this segment showed that the temperature criterion was exceeded 34 of 43 days.
Snohomish County	72567	Change to Category 3. Insufficient sample numbers to make a determination. One 7DadMax in 2006 used to support listing.	This listing remains in Category 5 based on data from year 2006. According to Policy 1-11, a segment will be placed in Category 5 for temperature if at last one 7-day average daily maximum value from seven consecutive daily sampling events exceeds the criterion. The temperature impairment for this assessment unit will be addressed by the forthcoming French/Pilchuck Temperature/D.O. TMDL.
Snohomish County	73890	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 26 measurements and 3 excursions represents only a 51% probability of true impairment	This listing remains in Category 5 based on data from years 2001, 2002, and 2003. According to Policy 1-11, a segment will be placed in Category 5 for temperature using single sample data when a minimum of three excursions exist from all data considered, and at least ten percent of single grab sample values in a given year exceed the criterion. Temperature impairments will be addressed in the forthcoming Skykomish Temperature TMDL.
Snohomish County	74192	Change Remark. Remark incorrectly refers to use of 2009 exceedance of geometric mean and % criterion when only 1 sample was available- Water Quality Policy requires> 2 samples	This remark was updated to correct the year that the geometric mean and percent criterion was exceeded.
Snohomish County	74323	Change Remark. Remark incorrectly refers to use of 2009 exceedance of geometric mean and % criterion when only 1 sample was available- Water Quality Policy requires> 2 samples.	This remark was updated to correct the year that the geometric mean and percent criterion was exceeded.
Snohomish County	78019	Review listing and place in more appropriate Category such as 2 or 3. Probability of impairment very low. 2008 USGS data showed no excursions. 2001 USGS data 4 of 5 samples exceeded criterion. Listing based upon 14 year old data.	This listing is in Category 4A and is covered by the Stillaguamish Multiparameter TMDL. Listing can move to Category 1 when the TMDL is being implemented and data shows that water quality has improved such that it qualifies for Category 1.
Snohomish County	78031	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in USGS external data source.	The 2007 USGS measurements of dissolved oxygen were conducted in a laboratory from an ambient sample rather than in the field. The data has a DQI code of "R" in the USGS NWIS database, which means that the laboratory results were reviewed and accepted by the laboratory and the project hydrologist as being valid results. Therefore, the results meet Ecology's QA requirements. The data point from 2005 could not be located in the NWIS database and has been removed from the listing. The removal of this data point does not affect the category designation since it was based on the 2007 data.
Snohomish County	22452	The listing for Total Phosphorus for Howard Lake is proposed to be changed from Category 2 to Category 1. The Category 2 listing was based on the 2003 Snohomish County State of Lakes Report describing the lake as "at risk" of impairment. It is not clear on what basis the proposed listing would be changed to Category 1. Data from Howard Lake show a statistically significant trend toward increasing total phosphorus concentrations as of 2010, as described in the 2010 State of the Lakes Update report for the lake. Snohomish County considers the lake to be at risk of future impairment if the trend continues. Therefore, we request that the listing remain Category 2 (Waters of Concern).	The listing has been retained in Category 2
Snohomish County	22560	The listing for Total Phosphorus for Lost Lake is proposed to be changed from Category 2 to Category 1. The Category 2 listing was based on the 2003 Snohomish County State of Lakes Report describing the lake as “at risk” of impairment. It is not clear on what basis the proposed listing would be changed to Category 1. Data from Lost Lake show a statistically significant trend toward increasing total phosphorus concentrations as of 2010, as described in the 2010 State of the Lakes Update report for the lake.	The listing has been retained in Category 2

		Snohomish County considers the lake to be at risk of future impairment if the trend continues. Therefore, we request that the listing remain Category 2 (Waters of Concern).	
Snohomish County	6353	The listing for Total Phosphorus for Martha Lake is proposed to be changed from Category 2 to Category 1. The Category 2 listing was based on the 2003 Snohomish County State of Lakes Report describing the lake as "at risk" of impairment. It is not clear on what basis the proposed listing would be changed to Category 1. Data from Martha Lake show a statistically significant trend toward increasing total phosphorus concentrations as of 2010, as described in the 2010 State of the Lakes Update report for the lake. Snohomish County considers the lake to be at risk of future impairment if the trend continues. Therefore, we request that the listing remain Category 2 (Waters of Concern).	The listing has been retained in Category 2.
Snohomish County	43024	The listing for Total Phosphorus for Stevens Lake is proposed to be changed from Category 2 to Category 1. The Category 2 listing was based on the 2003 Snohomish County State of Lakes Report describing the lake as "at risk" of impairment. It is not clear on what basis the proposed listing would be changed to Category 1. Data from Stevens Lake show a statistically significant trend toward increasing total phosphorus concentrations as of 2010, as described in the 2010 State of the Lakes Update report for the lake. Snohomish County considers the lake to be at risk of future impairment if the trend continues. Therefore, we request that the listing remain Category 2 (Waters of Concern).	The listing has been retained in Category 2
Snohomish County	22476	The listing for Total Phosphorus for Stickney Lake is proposed to be changed from Category 2 to Category 1. The Category 2 listing was based on the 2003 Snohomish County State of Lakes Report describing the lake as "at risk" of impairment. It is not clear on what basis the proposed listing would be changed to Category 1. Data from Stickney Lake show a statistically significant trend toward increasing total phosphorus concentrations as of 2010, as described in the 2010 State of the Lakes Update report for the lake. Snohomish County considers the lake to be at risk of future impairment if the trend continues. Therefore, we request that the listing remain Category 2 (Waters of Concern).	. The listing has been retained in Category 2
Snohomish County	4665	Listing ID #4665 proposes to retain a Category 2 listing for Invasive Exotic Species in Shoecraft Lake. Shoecraft Lake was, in fact, free of invasive Eurasian water milfoil plants from 2000 to 2007. However, the lake was re-infested with milfoil from adjacent Goodwin Lake in 2008. By 2010, the milfoil plants had spread again around much of the littoral area of the lake. Snohomish County has been performing herbicide treatments or hand removal of milfoil in Shoecraft Lake every year from 2008 to the present. Therefore, we request that Listing #4665 be changed to Category 4C Invasive Exotic Species to reflect the actual status of Invasive Exotic Species in the lake as of 2010.	The listing has been placed in Category 4C
Streamkeepers		The public remarks for Ennis 0.1 (Assessment listing ID 42902) appear dated and potentially misleading. The 2012 and 2008 categories are listed in the Assessment as 5 and the proposed category is also listed as 5. (There may be other similar archaic remarks connected to other listings, but we have not had time to review them all.)	The remarks for Listing 42902 and several others have been edited in order to avoid confusion regarding the validity of historic remarks that are no longer relevant.
Streamkeepers		Stream segmentation-Only a partial comparison of the NHD reach codes in Clallam County's GIS was done with those in the draft Assessment (10 cases out of more than 45). Some inconsistencies were found: Ennis 2.2 (Assessment listing ID 70044) is listed with a reach code ending in 0000113 in Clallam's GIS, but in the Assessment is listed as reach code ending in 0012961; Jimmycomelately 0.8 (Assessment listing ID 40668) is listed as reach code 0005329 in Clallam's GIS but in the Assessment as reach code 0000372. Some kind of reconciliation is needed between Clallam's and Assessment's NHD codes.	The NHD reach codes in the assessment for both Ennis Creek and Jimmycomelately Creek matches the NHD. Perhaps the reach codes were modified in the NHD at a later time than they were entered Clallam County database.
Streamkeepers		Bioassessment data-One sample which was submitted seems to be missing: Pysht 9.5, Location ID CCWR_00667, 9/18/2010. Inclusion/exclusion of samples collected in the years 2000-2006 is not consistent within the draft Assessment; for example, Bear (Sol Duc) 5.1 visit IDs 1293 and 7241 taken in 2002 and 2006 are not in the draft Assessment, although 2000 and 2001 results for this location are. Similar situation with Ennis 1.4 visit ID 4929, Jimmycomelately 0.2 and 0.6 visit IDs 1286 and 1287, Lees 0.8 visit IDs 57, 240, and 1311, Morse 1.5 and 5.6a visit IDs 6093 and 7226, Salt 4.2 visit IDs 4906 and 7216, Siebert 0.6 visit IDs 4910, 6121, and 7218, and Valley 0.4 and 2.2 visit IDs 48, 50 and 249.	During the process of combining previous and newer assessments, Location ID CCWR_00667 did not get fully updated into the WATS database. We appreciate the identification of this oversight.
Thurston County	3771	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in the Henderson Basin for Category 4A including Listing IDs 47737 and 47740 (Woodard Creek), 48058	This listing has not been moved to 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.

		(Eagle Creek), 48059 (Palm Creek), 48158 (College Creek), and 48061 (Fox Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.	
Thurston County	3773	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses temperature. Ecology has recommended other reaches with temperature impairments in the Henderson Basin for Category 4A including Listing ID 36180 (Woodland Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.	The identified listing has been moved to Category 4A because it is addressed by the Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL
Thurston County	3774	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in the Henderson Basin for Category 4A including Listing IDs 47737 and 47740 (Woodard Creek), 48058 (Eagle Creek), 48059 (Palm Creek), 48158 (College Creek), and 48061 (Fox Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	6808	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended sections of Yelm Creek be moved from Category 3 to 1 (Listing ID 22423); therefore it stands to reason that Yelm Creek is considered to be within the footprint of the Nisqually TMDL. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	The listing has not been moved to Category 4A. Yelm Creek is not addressed by the Nisqually bacteria and dissolved oxygen TMDLs.
Thurston County	7529	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	7532	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	9873	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	11649	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	15522	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.

		to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	
Thurston County	16718	The Nisqually River was a major part of the TMDL study and is referred to often in the TMDL. Furthermore, the Nisqually River was considered as meeting quality standards for fecal coliform bacteria at the monitoring station and not requiring load allocations (pg. 30). Best management practices were recommended for the Nisqually River which presumably would be addressing any water quality concerns. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	22422	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended sections of Yelm Creek be moved from Category 3 to 1 (Listing ID 22423); therefore it stands to reason that Yelm Creek is considered to be within the footprint of the Nisqually TMDL. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	The listing has not been moved to Category 4A. Yelm Creek is not addressed by the Nisqually bacteria and dissolved oxygen TMDLs.
Thurston County	23750	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which addresses temperature. Ecology has placed other reaches in this watershed for Category 4A including Listing ID 12582 (Perry Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	36184	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses temperature. Ecology has recommended other reaches with temperature impairments in the Henderson Basin for Category 4A including Listing ID 36180 (Woodland Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.	The temperature TMDL does not apply to the upper extents of the waterbody and therefore a category change is not warranted for this listing. Please refer to the TMDL document for further information
Thurston County	36185	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses temperature. Ecology has recommended other reaches with temperature impairments in the Henderson Basin for Category 4A including Listing ID 36180 (Woodland Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.	The temperature TMDL does not apply to the upper extents of the waterbody and therefore a category change is not warranted for this listing. Please refer to the TMDL document for further information
Thurston County	40587	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses pH. Ecology has recommended other reaches with pH impairments in the Henderson Basin for Category 4A including Listing IDs 72064 (College Creek), 51449 (Fleming Creek), and 40615 (Sleepy Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by pH levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	41118	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	41119	The map shows this listing in the Chehalis Basin in Thurston County, but the identifying information refers to it as in WRIA 7 (Snohomish). Recommend review and correction of listing. If review determines this listing is in the Chehalis Basin, it is part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.

		to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	
Thurston County	41122	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which addresses temperature. Ecology has placed other reaches in this watershed for Category 4A including Listing ID 12582 (Perry Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	42376	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for temperature for Burns Creek. Ecology has recommended other reaches with temperature impairments for other watersheds for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists. Recommend change to Category 4A.	The listing has not been moved to Category 4A. The TMDL covers Burns Creek for bacteria, not temperature. There are no load allocations for temperature for Burns Creek. See https://fortress.wa.gov/ecy/publications/documents/0603007.pdf.
Thurston County	45542	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	45751	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	45755	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	45760	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	46178	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	51438	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses pH. Ecology has recommended other reaches with pH impairments in the Henderson Basin for Category 4A including Listing IDs 72064 (College Creek), 51449 (Fleming Creek), and 40615 (Sleepy Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by pH levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	72101	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses pH. Ecology has recommended other reaches with impaired parameters that do not have loading allocations in the Henderson Basin for Category 4A including dissolved oxygen Listing IDs 47737 and 47740 (Woodard Creek), 48058 (Eagle Creek), 48059 (Palm Creek), 48158 (College Creek), and 48061 (Fox Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by pH levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.

		where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.	
Thurston County	72263	Part of the Upper Chehalis Fecal Coliform Total Maximum Daily Load which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with fecal coliform bacteria impairments in this TMDL study area for Category 4A. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	72268	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	The identified listing has been moved to Category 4A as it has been determined that the impairment is addressed by the Nisqually Watershed bacteria TMDL.
Thurston County	72487	Potentially part of the Upper Chehalis Fecal Coliform Total Maximum Daily Load which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with impairments in this TMDL study area for Category 4A. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists. Recommend review of location and change to Category 4A, if applicable.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	72497	Part of the Upper Chehalis Fecal Coliform Total Maximum Daily Load which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with impairments in this TMDL study area for Category 4A. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists. Recommend review of location and change to Category 4A, if applicable.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	73409	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which addresses temperature. Ecology has placed other reaches in this watershed for Category 4A including Listing ID 12582 (Perry Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	73976	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	73977	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	73993	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by high temperatures. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74238	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only

		recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74252	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	The identified listing has not been moved to Category 4A because REGIONAL staff confirmed that the impairment is not addressed by the TMDL.
Thurston County	74300	Could not find this listing on the map feature; therefore was unable to verify if this is or is not within the Nisqually TMDL footprint. Recommend Ecology review and correction of listing if appropriate	This listing was found to be a duplicate listing and has been inactivated
Thurston County	74412	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74413	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74420	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74444	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74456	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74534	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74535	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only

		recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74634	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74635	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74643	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12583 (Schneider Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	The identified listing has been moved to Category 4A as it has been determined that the impairment is addressed by a TMDL.
Thurston County	74644	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74645	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74700	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74848	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A. Note: if this is a marine impairment as noted in the remarks, it should not be included in this assessment (freshwater).	The listing has been placed in Category 4A because it has been determined that the impairment is addressed by a TMDL
Thurston County	74850	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Nisqually Reach and Drayton Passage are referred to in the existing TMDL. Ecology has recommended other reaches with bacteria	The listing has not been moved to Category 4A. REGIONAL staff concluded that the impairment is not addressed by the Nisqually bacteria TMDL.

		impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.	
Thurston County	74851	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	74968	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Nisqually Reach and Drayton Passage are referred to in the existing TMDL. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A	The listing has not been moved to Category 4A. REGIONAL staff concluded that the impairment is not addressed by the Nisqually bacteria TMDL
Thurston County	74990	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as being impaired by bacteria. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	77599	Part of the Upper Chehalis Dissolved Oxygen Total Maximum Daily Load which provides loading allocations for dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in this TMDL study area for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	77600	Part of the Upper Chehalis Dissolved Oxygen Total Maximum Daily Load which provides loading allocations for dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in this TMDL study area for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	77612	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in the Henderson Basin for Category 4A including Listing IDs 47737 and 47740 (Woodard Creek), 48058 (Eagle Creek), 48059 (Palm Creek), 48158 (College Creek), and 48061 (Fox Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	77752	Part of the Upper Chehalis Dissolved Oxygen Total Maximum Daily Load which provides loading allocations for dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in this TMDL study area for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	77753	Part of the Upper Chehalis Dissolved Oxygen Total Maximum Daily Load which provides loading allocations for dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in this TMDL study area for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.

		Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.	
Thurston County	77790	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	77791	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Thurston County	77792	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.	This listing has not been moved to Category 4A. The assessment unit is in Category 2, which means that it has not been identified as impaired by low DO levels. In general, only assessment units that qualify for Category 5 and are addressed by a TMDL are moved to Category 4A.
Trout Lake	Multiple	We were able to identify past tests (2004-06) on the reach of Trout Lake Creek in the national forest, and also test sites near where the Creek comes into the valley. However, in other listings, we were not clear how the upper and lower boundaries of the listing were determined. In other words, lacking systematic and deliberate past monitoring efforts, we would suggest further study to delineate the actual reach being listed.	Listings for a given waterbody are based on data that was collected by Ecology or submitted to Ecology. Data is assigned to individual assessment units. An assessment unit is an individual section of a stream for which all readily available data that has been collected along that section is compiled and evaluated. For streams, the monitoring point is mapped along the stream network using the National Hydrography Dataset (NHD) in order to determine to which assessment unit the data needs to be assigned. In general in the NHD, streams are segmented into reaches, each with their own numeric address, based on the location of inflowing tributaries. In this manner, a tributary confluence generally represents an NHD reach break (i.e. end of one reach and start of another). Whichever NHD reach the data was collected on becomes the assessment unit for the Water Quality Assessment. Data for each parameter (e.g. dissolved oxygen) from one NHD reach is not assessed with data from another NHD reach. They are evaluated separately and become separate listings. The boundaries of an assessment unit (i.e. the spatial extent covered by a single listing) are therefore defined by the stream network itself (tributary confluences) and thus the assessment units are hydrologic-based, precise, systematic, repeatable, and identifiable using standard geographic information systems software. We hope that the map viewer tool was helpful in locating the assessment units of interest. If in the future, you need assistance identifying the extent of a listing, please contact Ecology and we will provide such assistance.
Trout Lake		3. Two irrigation ditches are misnamed. One is called an unnamed tributary to the White Salmon and one is called the Trout Lake Ditch. They are actually, we believe, respectively the J. C. Hoke Ditch and the Coate Ditch.	The two ditches have been renamed in the database with the names provided in the comment
Trout Lake		We are startled to find so many proposed 303(d) listings for water bodies in the Trout Lake Valley. In most cases, comparing maps, there are no previous listings, in any category or parameter. This seems odd. Is this really the first time that any data has been reviewed for the Trout Lake Valley?	There are seven proposed Category 5 (303(d)) listings in the Trout Lake Valley, six of which were Category 3 listings previously; Some of these are entirely new and are based on data that was newly assessed, while other ones listings existed on the prior assessment, but had insufficient data (Category 3) to fully assess water quality. Since there are so many stream reaches with insufficient data, we chose not to include these in the compare tool because they would impede the review of listings that are more substantial. In this regard, the new Category 5 listings do not mean that water quality has gotten worse, but that we have

			sufficient credible data to determine that water quality standards are not being met where we previously did not have such data.
Trout Lake		In addition, the listings are concentrated on the east side of the valley. We suppose that this is because of the historic focus on the commercial dairies, the main properties of which are located on the east side. It seems, though, that valley-wide data would be helpful. There have been discussions in the past of changes and possible combinations of irrigation delivery systems, and those discussions might benefit from valley-wide data.	Ecology performed a bacteria monitoring study in the White Salmon River watershed in 2009 and 2010. This study focused on agricultural areas of the watershed where general land uses changes have decreased the potential for agricultural sources of water quality degradation, but also where additional monitoring locations were needed to help identify where the implementation of alternative management practices would result in a reduction in bacteria pollution.
Trout Lake		8. We did not understand the use of the word “excursion”, as in “Location ID…..showed an excursion of the criteria for this waterbody”. We appreciate the chance to comment, and we regret that we do not have enough time to provide more thorough comments.	The term "excursion" means that a data point did not meet an applicable water quality criterion; for example, if the applicable dissolved oxygen criterion is 9.5mg/L and a measurement at a site showed that a dissolved oxygen level of 7.5mg/L, this would be an excursion from the criterion.
Trout Lake		We also did not see data from Riverkeeper, who have had resident testers doing limited, but steady, testing in the Valley for several years.	Ecology has made significant efforts to collect data from all parties willing to share their data. There are data from the "Volunteer Water Quality Monitoring: Baseline Monitoring of Columbia River Tributaries" in the assessment; most likely this is listed by the study and location and not the monitoring group. An associated study ID is CRK-06.
Trout Lake		We did not see data from the fairly extensive data collection done over many years by the Underwood Conservation District. Was this data included?	Ecology has made significant efforts to collect data from all parties willing to share their data. There are data from the Underwood Conservation District in the assessment, however, much of that data does appear to be prior to the mid-2000.
USBOR		Ecology has been acquiring Project water quality data from STORET dating back to the late 1990's. The data has been used by Ecology to assess waterbody impairments. The data in STORET is Project data that has been validated by the laboratory for Quality Assurance/Quality Control (QA/QC). However, QA/QC has not been fully applied to the data that is entered into STORET; therefore, the data is still classified as raw data by Reclamation. The data retrieved from STORET does not meet the requirements for credible data for water quality management. Therefore, Reclamation requests that Ecology remove Project 303(d) listings that resulted from the STORET data.	US Bureau of Reclamation has informed Ecology that the STORET Project data have not been through appropriate QA\QC in accordance with credible data requirements and should not be used for assessment. Ecology has removed these data from the assessments.
USEPA		In the Ecology Water Quality Assessment database, there are 18 listings that are proposed as Category 4A that aren't linked to a TMDL: 14571- Stillaguamish River, 22950- Wapato lake, 41848- No Name Creek, 45209- Riley Slough, 53116- Wilson Creek, 70737-Chelan Jake, 73029-Icicle Creek, 73030 Mission Creek, 73031-Icicle Creek, 73035-Wenatchee River, 73037 Chiwawa River, 73038-Wenatchee River, 73050-Nason Creek, 73053-Icicle Creek, 73055-Icicle Creek, 73073-Little Spokane River, 74043, Walla Walla River, 74286-Peshastin Irrigation Return. Please ensure that a specific "Water Quality Improvement Report" is identified for each waterbody that is placed in Category 4A.	The listings identified in the comment have been tagged with their associated Water Quality Improvement Project Name.
USFS-Colville	45783	Mislabeled. NHD 17020003000727	The coincidence of the listing station from EIM WC8 (G9500289) and NHD reach code 17020003000727 has been verified. No change is warranted to the reach code associated with the identified listing. The EIM station location description may misrepresent the location in stating it occurs at the “Burnt Valley Rd" crossing, but the mapped location of the station is correct.
USFS-Colville	45637	All below FS; Upper Pend Oreille Sub-Watershed Ranking Study; location probably West Calispell County Road	Comment noted
USFS-Colville	72237	Not on FS land. Entirely below FS	Comment noted. No action needed.
USFS-Colville	70399	Not on FS land. Entirely below FS	Comment noted. No action needed.
USFS-Colville	8601	Category 5 reach is on private, below Forest. Wasson samples were taken at Greenhouse County Road, not on FS land.	The data indicates that the bacteria criterion was not met on both the Forest Service and private lands portions of the assessment unit
USFS-Colville	6727	This reach is 2.5+ miles below any FS tribute	Comment noted. No action needed.
USFS-Colville	8527	Not on FS land. Entirely below FS	Comment noted. No action needed.
USFS-Colville	38139	Not on FS land. Entirely below FS	Comment noted. No action needed
USFS-Colville	45637	Not on FS land. Entirely below FS	Comment noted. No action needed
USFS-Colville	8567	Not on FS land.	Comment noted. No action needed
USFS-Colville	8563	Not on FS land.	Comment noted. No action needed

USFS-Colville	38325	Not on FS land.	Comment noted. No action needed
USFS-Colville	45641	Not on FS land.	Comment noted. No action needed.
USFS-Colville	16874	Not on FS land.	Comment noted. No action needed.
USFS-Colville	38256	Not on FS land. Entirely below FS	Comment noted. No action needed.
USFS-Colville	46283	Not on FS land. Entirely below FS	Comment noted. No action needed.
USFS-Colville	38252	Not on FS land. Entirely below FS	Comment noted. No action needed.
USFS-Colville	45639	Not on FS land.	Comment noted. No action needed.
USFS-Colville	8467	Not on FS land.	Comment noted. No action needed. Note that this Category 3 listing is in fact on USFS land.
USFS-Colville	38161	Not on FS land. Entirely below DNR.	Comment noted. No action needed.
USFS-Colville	38158	Not on FS land.	Comment noted. No action needed.
USFS-Colville	38146	Not on FS land. Entirely below FS.	Comment noted. No action needed.
USFS-Colville	45662	Not on FS land.	Comment noted. No action needed.
USFS-Colville	38281	Not on FS land.	Comment noted. No action needed.
USFS-Colville	38092	Not on FS land.	Comment noted. No action needed.
USFS-Colville	45656	Not on FS land. Entirely below FS.	Comment noted. No action needed.
USFS-Colville	38213	Not on FS land.	Comment noted. No action needed.
USFS-Colville	8840	Not on FS land.	Comment noted. No action needed.
USFS-Colville	8562	Not on FS land. Entirely below FS.	A small portion of the Assessment Unit is on USFS lands. There is no change in the Water Quality standards across the USFS boundary
USFS-Colville	8603	Not on FS land.	Comment noted. No action needed.
USFS-Colville	8459	Not on FS land. Entirely below FS.	Comment noted. No action needed. We note that the upper portion of the assessment unit is in fact on USFS land.
USFS-Colville	38026	This is labeled as Wilson Creek. It should be labeled Unnamed Creek (Trib to Chewelah Creek, S.F.).	The waterbody name for the listings associated with this assessment unit has been changed to Unnamed Creek (Trib to Chewelah Creek, S.F.).
USFS-Colville	38018	The name of this Creek is Harthill Creek. It is labeled as Unnamed Creek (trib to Chewelah Creek, N.F.).	The name of the creek associated with this assessment unit is Butte Creek in the NHD. Harthill Creek is over the ridge to the south. The waterbody name for the listings associated with the assessment unit of interest has been changed to Butte Creek.
USFS-Colville	38311	This is labeled as South Salmo River. Should be labeled Salmo River, S.F.	The waterbody name has been changed to Salmo River, S.F.
USFS-Colville	38310	This is labeled as South Salmo River. Should be labeled Salmo River, S.F.	The waterbody name has been changed to Salmo River, S.F.
USFS-Colville	46266	Labeled as Lone Ranch Creek, S.F. Should be labeled as Lone Ranch Creek, N.F.	The waterbody name for listings with assessment unit ID of 17020002000280 have been changed to Lone Ranch Creek, S.F.
USFS-Colville	37985	Listed as Wilson Creek. Should be listed as Healy Creek.	The waterbody name is listed as Healy Creek in the assessment.
USFS-Colville	21716	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listing has been corrected.
USFS-Colville	21760	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	19858	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	19861	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	38026	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.

USFS-Colville	38189	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8517	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21757	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	37942	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	19856	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21839	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8519	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8503	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21771	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21759	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	19859	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8603	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21812	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21813	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	19863	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21719	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.

USFS-Colville	38004	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21738	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8468	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8527	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	19857	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	19860	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	38188	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8453	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8541	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	8457	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	38080	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	21749	Was listed as 4A in 2004. We did not have an approved TMDL until 2006	The comment is correct. EPA approved the TMDL on August 5th, 2005 and the implementation plan was completed in August 2006 (revised Oct. 2006). The listing history for the affected listings has been corrected.
USFS-Colville	38092	It is proposed to be changed to a Category 1. We propose you keep it a Category 4A.	The most recent year of data shows that the water quality criterion for bacteria has been met and we were not presented with information suggesting why this listing should remain in Category 4A. Therefore, the proposed Category 1 designation for the listing will not change.
USFS-Colville	38189	Change to a Category 1 per CNF data. Separate attachment. Data also submitted into EIM Dec. 2014. Waiting for approval.	This assessment unit should retain the Category 4A listing as the most recent data indicate that the criterion is exceeded. Data from Water Year 2010 shows excursions of the percent criterion (at least 10 samples collected in one year or 23% exceeded the criterion).
USFS-Colville	38188	Change to a Category 1 per CNF data. Separate attachment. Data also submitted into EIM Dec. 2014. Waiting for approval.	The data provided in the comment on the Category 4A assessment unit were assessed. In water year 2010 the data provided were found to exceed the percent criterion. We have determined that there is no change in category during this assessment cycle, based on data assessed within the window (2001 - 2010). Data provided outside of the data assessment time frame will be assessed during the next Assessment cycle.
USFS-Colville	38080	Change to a Category 1 per CNF data. Separate attachment. Data also submitted into EIM Dec. 2014. Waiting for approval.	The data provided are from 2011 and 2012 and are outside of the data assessment time frame (2001 - 2010). This more recent data will be assessed during the next Assessment cycle.

USFS-Colville	77225	Do not correspond to anything in the WA-ECY database. The numbers do not return any data.	Ecology confirmed that the station and results are contained within the EIM database. Please contact us if you still cannot locate the data. This listing is for the waters downstream of the Forest Service boundary.
USFS-Colville	72237	Do not correspond to anything in the WA-ECY database. The numbers do not return any data.	Ecology confirmed that the station and results are contained within the EIM database. Please contact us if you still cannot locate the data. This listing is for waters entirely within the Forest Service Boundary.
USFS-Colville	38248	Supporting data inconsistent.	The most recent and applicable water year of data (2007) indicate that there were no excursions of the criterion. In water year 2007, 1 of 22 sample values (5%) showed an excursion of the % criterion for this waterbody (100 cfu/100mL). The geometric mean of 8.6 does not exceed the geometric mean criterion (50 cfu/100mL). There are no indications of excursions in the data after 2007.
USFS-Colville	8541	Change to a Category 1 per CNF data. Separate attachment. Data also submitted into EIM Dec. 2014. Waiting for approval.	The provided data on the Category 4A assessment unit were assessed. Data assessment led to the recommended change to Category 1.
USFS-Colville	8178	Change to a Category 1 per CNF data. Separate attachment. Data also submitted into EIM Dec. 2014. Waiting for approval.	The data provided were outside the call for data period, and are not on a Category 4A priority assessment unit. Data will be assessed during the next listing cycle.
USFS-Colville	8563	Not on FS land. Entirely below FS.	The assessment of this waterbody into Category 1 used the Extraordinary Primary Contact Recreation Criterion, based on a monitoring location within the National Forest. Because of the low excursion thresholds, waters meeting this criterion will also meet all the other contract recreation criteria. Therefore the Category 1 determination is correct. However, Ecology has noted that there should be a separate assessment unit (or a split in the current assessment unit) created downstream of the forest boundary.
US Navy	71188	Could you please send me (or point me toward) the data related to this proposed listing.	The data used in this assessment were from the USGS NWIS database for stations 12163020 - JIM CREEK ABOVE HATCHERY CREEK NEAR OSO, WA and 12163270 - REHAB CREEK NEAR OSO, WA (http://nwis.waterdata.usgs.gov/nwis).
US Navy	78019	What is the source of the data that resulted in the proposed Category 5 listing? Can you provide please. My observation of Jim Creek at the Radio Station is that it is fast running and well aerated - many rocks and small water drops that would enhance DO levels.	The source of the data is from the USGS National Water Information System (NWIS). It was collected by USGS Tacoma Field Office. This is older data from 2001, more recent data from 2008 did not show excursions. However both years are discrete data, 2008 measurements were generally taken before noon at relatively cool temperatures, and there are no continuous DO data available for the assessment. This data has been validated within the USGS system and did not have a qualifier code, so it was approved for use in the assessment. Data can be download from USGS NWIS, the station codes are: USGS-12163270 and USGS-12163020. -NM 5/15/15
Vancouver	46972	The correct location of Peterson Ditch and other tributaries to Burnt Bridge Creek has been mapped and approved in the DNR maps as of the end of 2012.Work to get the stream segments corrected was initiated in 2008 with Ecology staff and we moved it through a DNR water modification process. The corrected stream segments can be found in the WCHYDRO layer from DNR which is where the original stream segments in your maps was pulled from according to Ken Koch. The metadata is located at: https://fortress.wa.gov/dnr/adminsa/gisdata/metadata/WA_Hydro_Data_Dic.htm Please contact me for additional information if needed. I can provide documentation from DNR. This update will impact most listings on Peterson Ditch and Burnt Bridge Creek due to the new stream assessment units. Peterson Ditch has no tributaries, Burnt Bridge Creek has three main tributaries (Peterson, Burton and Cold Creek) that will be identified by the corrected maps. For Peterson Ditch, monitoring site PET 1.3 is at the headwater, PET 0.0 is just above the confluence with Burnt Bridge Creek and has also been represented as location BBC6 and BBC6B in historic monitoring. Listings that will be impacted on Peterson Ditch with mapping and analysis of the NHD reach include: 46972,48661,72873,73857,74315, 74316	We appreciate the reminder of the mapping corrections that are needed. We agree that it is important to update the waterbody mapping in this area. Changes to waterbody mapping and assessment unit delineation in this watershed based on the DNR data will require changes to the NHD. We intend make such revisions during the next assessment cycle as we do not have the resources to complete these revisions during this cycle. However, we note that there were duplicate listings for bacteria and temperature in the lower end of Peterson Ditch that have been corrected. Listings 46972 (bacteria) and 48661 (temperature) are the valid listings for the lowermost portion of the ditch.
Vancouver	7827	Incorrect mapping for tributaries in the Burnt Bridge Creek watershed was introduced to Ecology and Clark County maps when stream segment data was imported from Washington State Department of Natural Resources. The process to remove mapped segments that did not exist and add those tributaries that are currently contributing flow to the main stem took almost five years. The correct stream segments can be found in the WCHYDRO layer from DNR which is where the original stream segments in your maps was	We agree that it is important to update the waterbody mapping and assessment units in this area. Changes to the waterbody mapping in this watershed based on the DNR data will require changes to the NHD. We intend to make such revisions for the next water quality assessment.

		pulled from according to Ken Koch. The metadata is located at: https://fortress.wa.gov/dnr/adminsa/gisdata/metadata/WA_Hydro_Data_Dic.htm Please contact me for additional information if needed. I can provide documentation from DNR. Now that there has been a change to the segmentation system used in the listing process it is important that the maps be corrected to reflect the tributary confluences as most of the listings on the main stem and the Peterson Ditch tributary will be impacted by the confluence to confluence segmentation.	
Vancouver	50926	Under the Basis for listing there are two BBC6 (Peterson Ditch) sample sets noted for 2006. One for 0 of 2 sample values and the last on for 2 of 6 showing an excursion. Six sets of data were collected that season but only two sets of pH data met QA/QC standards, rejecting a significant amount of 2006 pH data, unfortunately qualified after submittal to EIM. Only 2 of the 6 samples collected (7/20 and 8/15) met QA/QC. The other four values (6/29, 8/31, 9/20, 10/12) should have been qualified as rejected data. The consultant, Margaret Ocilla with PBS Environmental, worked with Becca Conklin to flag and or remove the unreliable data. Please contact me if you would like more specifics on the data from BBCWQ06.	The assessment was corrected to account for data collection QA/QC problems. Per Policy 1-11 (2012), Category 1 determinations require continuous data collection. Until continuous data are available to determine that the standards/criterion are being met, the Category 3 determination will remain.
Vancouver	51515	Listing ID 51515-Request change of category listing based on use of inappropriate data and concerns about field calibration records for instruments and field sampling records. Request documentation of these to verify quality assurance concerns.	The original Category 3 listing was determined prior to the creation of the Large River Assessment Units. Other monitoring stations have been added to this Assessment Unit. EIM states "LEVEL 4: Approved QAPP or SAP" and "Level 3 – Data Verified and Assessed for Usability." There are sufficient excursions over multiple years to justify the Category 5 determination.
Vancouver	49044	Listing ID 49044-Request change of category listing based on use of inappropriate data and concerns about field calibration records for instruments and field sampling records. Request documentation of these to verify quality assurance concerns.	This listing was determined in the previous Integrated Report/303(d) list and approved by EPA. There are not sufficient current data to change this listing to another category, and there are no indications that the data did not meet the quality assurance requirements when originally assessed.
Vancouver	49047	Listing ID 49047-Request change of category listing based on use of inappropriate data and concerns about field calibration records for instruments and field sampling records. Request documentation of these to verify quality assurance concerns.	This listing was determined in the previous Integrated Report/303(d) list and approved by EPA. There are not sufficient current data to change this listing to another category, and there are no indications that the data did not meet the quality assurance requirements when originally assessed.
Weyerhaeuser	3788	Ecology's database indicates this waterbody segment is being downgraded from Category 2 to Category 5 as a result of a discretionary re-segmentation of the Columbia River, coupled with temperature data apparently collected at river mile 71.9. Weyerhaeuser believes Ecology has not properly applied the WAC 173-201A t temperature water quality standard for this segment of the Columbia River. Proper interpretation of the water quality criteria and consideration of available river temperature data would best support a Category 1 or perhaps a Category 3 listing. An assessment of impairment/non-impairment of the temperature criteria for the lower Columbia River require determinations of ambient river temperature attributable to "natural conditions" and then "due to human activities." To summarize, the best information available says that natural conditions are greater than 20.0° C., one day maximum, in the listing segment #3788, and that human activities do not cause increases of more than the 0.3° C. to 1.1° C. thresholds. As such, this segment of the Columbia River achieves the WAC 173-201A temperature standard. It should be listed as Category 1. It could be assigned a placeholder spot on the Category 3 list (" ... there are insufficient water quality data available to make a determination on the status of water quality criteria or a designated use ... ") or perhaps Category 3.	Temperature listings based on numeric criteria exceedances are done in accordance with Policy 1-11 (page 44) which states: "Ecology lists waterbody segments on the Category 5 list due to temperature impairment when the numeric criteria are exceeded. In most cases, insufficient information exists to determine the level of human influence on temperature for each listed site. This approach assumes that human influences have contributed to the exceedance over the numeric criteria and the increase is measurable over natural conditions. While this approach may list waterbody segments as impaired for temperature without fully knowing the extent of the human influences, listings are based on existing and readily available information. In the absence of information, the waterbody segment will remain in Category 5 until further information or data are provided to change the category determination."
Weyerhaeuser	48649	The listing rationale for Thurston Cr indicates that the criterion is 17.5 and 16.0. Is one for the lower and one for the upper segment (2012 vs 2014 listing)? Location ID [13THU00.1] -- between 7/4/2003 and 10/23/2003 there were no occurrences in which the 7-day mean of daily maximum value exceeded the temperature criterion for this waterbody, (criterion = 17.5°C). Location ID: 13THU00.1 -- In 2003, between 7/4/2003 and 10/23/2003, the 7-day mean of daily maximum values (7DADmax) exceeded the criterion for this waterbody (16°C) on 15 of 112 days (13%); The maximum exceedance during this period was 16.72°C for the 7-day period centered on 7/30/2003	This was an error in the basis statements that resulted from the 2006 standards revision and should have been rectified prior to public review. These errors were manually cleaned up in the Assessment database and the basis statements were corrected with an added remark for this listing and 62 other temperature listings with the same error.

Weyerhaeuser	6697	The Department proposes a Category 5 listing for ID 6697, Columbia River, bacteria, based on data in "Lower Columbia River Bi-State Water Quality Program: Bacteria Studies," Washington Department of Ecology publication #93-28, Hallock and Ehinger, April 1993. The data in this report, when reviewed against WAC 173-201A and coupled with listing criteria in Water Quality Policy Policy 1-11, do not support a conclusion of a water quality standards violation or a Category 5 listing. This waterbody segment/pollutant listing should be moved to Category 2 or just removed from the 303(d) list. This Category 5 listing should never have been made.	Assessment of the data were made according to the policies in place in 1998. Data prior to 2000 were not re-examined in this assessment cycle. There were no current data available to determine if the conditions had changed since the previous assessment. Until such a time, the 1998 assessment will remain in effect for this listing.
Weyerhaeuser	72805	The basis statement incorrectly lists the temperature criterion as 17.5° C (7DADmax). Table 602 identifies the correct criterion of this section of the Columbia River (20.0° C, 1-D Max, then allowed human activity increases). These waterbody segments should be re-categorized to Category 1 or 3, based on the rationale offered for listing 10# 3788.	We appreciate your identification of an error that occurred while creating the Large River Assessment Units. The locations in question have been examined and assessed.
Weyerhaeuser	3784	The basis statement incorrectly lists the temperature criterion as 17.5° C (7DADmax). Table 602 identifies the correct criterion of this section of the Columbia River (20.0° C, 1–D Max, then allowed human activity increases). These waterbody segments should be re-categorized to Category 1 or 3, based on the rationale offered for listing 10# 3788.	We appreciate your identification of an error that occurred while creating the Large River Assessment Units. The locations in question have been examined and assessed.
Weyerhaeuser	3785	The basis statement incorrectly lists the temperature criterion as 17.5° C (7DADmax). Table 602 identifies the correct criterion of this section of the Columbia River (20.0° C, 1–D Max, then allowed human activity increases). These waterbody segments should be re-categorized to Category 1 or 3, based on the rationale offered for listing 10# 3788.	We appreciate your identification of an error that occurred while creating the Large River Assessment Units. The locations in question have been examined and assessed.
Weyerhaeuser	78120	The draft listing description incorrectly says the dissolved oxygen water quality criterion is 8 mg/1, one-day minimum. Table 602 in WAC 173-201A indicates the dissolved oxygen criterion is "Dissolved oxygen shall exceed 90 percent of saturation" for this section of the Columbia River. Ecology needs to correctly identify the relevant criterion and re-evaluate available data.	This appears to have been an oversight in adopting the NHD stream classification. Ecology staff examined the data using the 90th percent dissolved oxygen saturation and found the Category 5 listing is accurate, but there are now 4 dates in 7 in 2009 that were excursions from the criterion.
Weyerhaeuser	7783	The Longview Ditches are not named in Table 602 of WAC 173-201A. The applicable dissolved oxygen criterion are thus to support "salmonid spawning, rearing, and migration" and are presented at WAC 173-201A-200(l) (d). The given aquatic life criterion of 8.0 mg/1, lowest one-day minimum, also includes a natural conditions provision. Dissolved oxygen in the Longview Ditches is surely low. A water quality assessment by the City of Longview (2002) presented technical information supporting a proposition that low dissolved oxygen is due to natural conditions. The agency apparently disagrees. Ecology rationalizes that human activitiescontribute to dissolved oxygen excursions and the raw data therefore justifies a Category 5 listing. Weyerhaeuser believes the agency is mis-applying the WAC 173-201A standard. In order to demonstrate a water quality standards impairment and then a Category 5 listing, it is first necessary to define the natural condition of the Longview Ditches. The agency has made no attempt to determine the natural conditions over the last decade, let alone whether human activities contribute to greater than a 0.2 mg/1 deficit from those natural conditions. The appropriate listing for this Longview Ditches segment/dissolved oxygen would be Category 2 or 3.	This listing was determined in the previous Integrated Report/303(d) list and accepted by EPA. Ecology has not identified any overwhelming data nor evidence indicating an error was made in the original assessment. There are not sufficient data to indicate that these waters are meeting the dissolved oxygen criterion, nor that human activities are not contributing to the excursions. The assessment unit will remain in Category 5 until data are provided that indicate that the water quality standards are being met. Per Policy 1-11 (2012) this requires continuous monitoring throughout the seasonal duration in which dissolved oxygen concentrations are expected to be lowest and the most recent two years in which the data exists to show no excursions below the criterion.
White Salmon	21594	The City has technical concerns about the basis for listing Buck Creek. Based on the available flow and temperature data and the relatively protected nature of the DNR lands in the Buck Creek drainage, the City believes the observed temperature exceedances are largely driven by natural summer flow conditions, rather than human caused. The City requests that Ecology carefully consider this information in evaluating whether to include Buck Creek as a Category 5 impaired water for temperature in the final 303(d) list.	The proposed category designation for Listing 21594 has been changed from Category 5 to Category 3 in recognition that the temperature data leading to the Category 5 designation was collected from a portion of Buck Creek that was inundated due to the Condit dam (i.e. in backwaters at the mouth of Buck Creek due to dam storage on the White Salmon River) and with the removal of the dam the data is not likely to represent current hydrological characteristics in lower Buck Creek
White Salmon	72898	The City also has concerns with listing of the lower White Salmon River as impaired for temperature. This proposed listing is based on temperature exceedances from data collected in 2009 and 2010. These data were collected while Condit Dam was in place upstream of the reach proposed for listing, creating the Northwestern Lake impoundment. Condit Dam was removed in October 2011, and the river is now free-flowing through the former Northwestern Lake. The data indicating temperature exceedances downstream of the former Condit Dam do not reflect current conditions and which have undoubtable improved, and designation of this reach as impaired for temperature should be rejected. If Ecology is unable to revise the Category 5 listing for all of Buck Creek based on the removal of Condit Dam and associated effects on	Listing 72898 has been revised, but not for the reason stated in the comment (i.e. Condit dam removal). Since the dam released water from the hypolimnion rather than the surface of the former reservoir, and subsurface temperatures in a reservoir are typically significantly cooler than surface temperatures, we do not think that removal of the dam would necessarily cause maximum water temperatures in the downstream reaches to be lower than previously observed. Therefore, in this case we do not agree with the premise that the most recent (and only) available data for the assessment unit should not be considered in the listing for the reason that it was collected before the dam was removed. However, it has been recognized

		temperature, the City requests that as an alternative Buck Creek be divided into two stream segments to more accurately characterize temperature regimes within the watershed. Currently the proposed Category 5 listed reach extends from the confluence of Buck Creek and the South Fork Buck Creek to the confluence with the Salmon River (Figure 1). We understand that hydrologic changes are the likely delineation points in the current Ecology methodology. When the current water quality assessment data were collected the lowest reach of Buck Creek affected by the Condit Dam impoundment represented a hydrologic flow regime distinct from the free-flowing reaches located upstream. As such it is appropriate to separate the creek into two reaches, one representing the area affected by the impoundment and the second representing the free-flowing creek. As presented below, temperature data collected about 1.5 miles upstream in Buck Creek were considerably lower than at the confluence with the White Salmon River, exhibiting no exceedances. Therefore, the City would request that the reach of Buck Creek unaffected by the f01mer Condit dam impoundment be changes to Category 1 (meets standards) or Category 3 (insufficient data). The lowest reach affected by the impoundment would remain listed as a Category 5 water impaired for temperature pending new data.	that a portion of the NHD reach is within the backwaters of the Bonneville dam and that all of the associated data was collected from the portion of the reach within the inundation zone. Therefore the assessment unit has been split at the location where the inundation zone appears to end. Listings 47414, 51055, 72330, and 72898 now address only the portion of the river within the Columbia River inundation zone. The water quality criteria applicable to the portion of the Columbia River into which this waterbody flows apply to this modified assessment unit. Listing 47414 has been placed in Category 2 due to an excursion from the Columbia River dissolved oxygen saturation criterion. The proposed Category 5 designation for Listing 72898 remains unchanged because the Columbia River temperature criterion of 20 degrees Celsius has been exceeded multiple times.
WSID	21594	The White Salmon Irrigation District is submitting comments on your proposed Category 5 temperature listing for Buck Creek (Listing ID21594). The district feels in important to apprise you of the changing conditions in the White Salmon Basin since the most recent data was collected. In October of 2011 Condit Dam was breached returning the White Salmon to a free flowing natural river. This has since reintroduced anadromous salmonid species into buck creek. The Irrigation district has a 90 year diversion on buck creek and a dam that does not currently allow for fish passage. We are currently working with the Underwood Conservation District, Yakama Nation, Department of Ecology, Department of Natural Resources, Klickitat County, and the Washington State Recreation and Conservation Office to bring the dam into compliance with fish passage requirements. We request that due to this hydrographic limitation that the reaches remain separate and distinct as is shown in the 2012 spatial extent until such time that the dam if in full fish compliance.	The proposed category designation for Listing 21594 has been changed from Category 5 to Category 3 in recognition that the temperature data leading to the Category 5 designation was collected from a portion of Buck Creek that was inundated due to the Condit dam, and with the removal of the dam the data is not likely to represent current hydrological characteristics in lower Buck Creek. In regard to the spatial extent of the assessment unit, all assessment units for streams in the state are being delineated on the basis of the National Hydrography Dataset (NHD) for this assessment. We do not think that using the old assessment units for Buck Creek in this assessment would result in significant water quality protection benefits and consequently have made a decision not to change the assessment unit delineation.
WSID	21594	For the proposed Category 5 temperature listing for Buck Creek (Listing ID21594), The Irrigation District requests that your remand Buck Creek into two segments and the listing be changed to Category 3. We fully realize and understand the immensity of your undertaking with this project and applaud your efforts. We the district feel the special circumstances with the removal of one of the largest fish passage barriers in history warrants further consideration and review in this matter.	The proposed category designation for Listing 21594 has been changed from Category 5 to Category 3 in recognition that the temperature data leading to the Category 5 designation was collected from a portion of Buck Creek that was inundated due to the Conduit dam and with the removal of the dam the data is not likely to represent current hydrological characteristics in lower Buck Creek. In regards to the spatial extent of the assessment unit, all assessment units for streams in the state are being delineated on the basis of the National Hydrography Dataset for this assessment. We do not think that using the old assessment units for Buck Creek in this assessment would result in significant water quality protection benefits and therefore decline to change the assessment unit delineation.
WSID		We further request that the designated use for Buck Creek remain as a 17.5C stream for Salmonid Spawning, Rearing, and Migration until such time as Ecology allows data from October 2011 and onward into the allowed dataset for Buck Creek. The removal of Condit Dam has significantly altered the hydrography, and habitat of the White Salmon River. The White Salmon Irrigation District will not oppose the lowering of stream temperature to 16C for Core Summer Salmonid Habitat during the next assessment so long as data from October 2011 and onward is the only accepted data.	As specified in the state water quality standards, 16 degrees Celsius is the applicable water quality temperature criterion for protecting Summer Core Salmonid Habitat in Buck Creek (Klickitat County). Data used in the subsequent water quality assessment will be evaluated from a ten year period that overlaps the time period used in the current assessment. For example, if the next call for data is issued in early 2016, the data used in the assessment would likely be from January 2006 through December 2015. There are several reasons for this overlap, but in general, it helps to ensure the accuracy of category determinations in light of ongoing monitoring efforts. We are not in a position to use data windows individualized for specific waterbodies or to apply a truncated data window to all waterbodies statewide in the next assessment, however, we can and do account for available data that may not be representative of current conditions on an individual waterbody basis. That being said, we have noted the likely influence of the Condit dam removal upon water temperatures in the portion of Buck Creek associated with listing 21594. This listing has been changed from Category 5 to Category 3 in recognition that the temperature data leading to the Category 5 designation was collected from a portion of Buck Creek that was inundated due to the

			Conduit dam and with the removal of the dam the data is not likely to represent current hydrological characteristics in lower Buck Creek.
WSID		We are aware that the Water temperature gauging station WQ-2 was washed away with the breaching of Condit Dam. This puts into question the reliability and quality of all of the data taken from this station. The potential influence from the inundation of Northwestern Lake compromises the Quality Assurance that gives the ecology assessment credence.	The proposed category designation for Listing 21594 has been changed from Category 5 to Category 3 in recognition that the temperature data leading to the Category 5 designation was collected from a portion of Buck Creek that was inundated due to the Condit dam (i.e. in backwaters at the mouth of Buck Creek due to dam storage on the White Salmon River) and with the removal of the dam the data is not likely to represent current hydrological characteristics in lower Buck Creek.